



ENVIRONMENTAL, SOCIAL
AND GOVERNANCE REPORT
2023



Liner Trading network

We provide our customers with a reliable liner-trading network with fixed sailing schedules serviced by our purpose built pure car and truck carriers



20
Nationalities



13
Vessels



198
Seagoing
Employees



84
Shore-based
employees



Introduction

This is United European Car Carriers (UECC) second environmental, social, and governance (ESG) report, covering activities in the 2023 calendar year from 1st January 2023 to 31st December 2023. This report provides an overview of the company's sustainability activities and operational targets in line with the requirements of the internationally recognised Sustainability Accounting Standards Board (SASB) requirements.

UECC is a leading provider of sustainable short sea RoRo transportation services in Europe, specialising in the shipment of automobiles and other rolling cargo. With over 34 years of industry experience, UECC operates a modern fleet of 13 vessels designed to deliver efficient, reliable, and environmentally responsible transport solutions. Our state-of-the-art fleet consists of dual-fuel LNG vessels and three multi-fuel LNG battery hybrid vessels, which significantly reduce emissions and enhance fuel efficiency.

The company is dedicated to maintaining high standards of operational performance. Our comprehensive ESG strategy guides our efforts to minimise environmental impact, support social initiatives, and uphold strong governance practices. We believe that our commitment to sustainability is essential for long-term, continued success and value creation.

We are pleased to have upgraded our strategy in line with the IMO revised greenhouse gas strategy to reach net zero by 2040 and to have established our sustainability-related targets in line with upcoming regulations, including the CSRD, EU ETS, and FuelEU.

UECC Values

Unity

Being open, sharing and succeeding together.

Energy

Being enthusiastic and positive.

Challenging

Being proactive and encourage development.

Commitment

Being respectful and loyal to decisions, strategies and policies.

Disclaimer

In this report, the Company may make forward-looking statements or provide forward-looking information. All statements other than statements of historical facts should be considered forward-looking statements. Although such statements reflect the Company's current expectations, these statements are not guarantees of future performance, but involve risks, uncertainties, and assumptions which are difficult to predict.

This report is informed by metrics defined by the Sustainability Accounting Standards Board's (SASB) MARINE TRANSPORTATION: Sustainability Accounting Standard Sustainable Industry Classification System® (SICS®) TR-MT Prepared by the Sustainability Accounting Standards Board (October 2018), as well as taking into account relevant disclosure metrics set out by "Reporting for Signatories, United Nations: Principles for Responsible Investing (PRI) 2020." Supplementary disclosure metrics designed by Infrastructure Technical International Ltd (ITI).

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Glen Edvardsen – CEO, UECC

CEO Foreword

At UECC, sustainability is not just a commitment; it is a cornerstone and strategic driver for our future growth. Our vision is clear: to be the leading provider of sustainable short sea roll-on/roll-off transportation services in Europe. Our ESG strategy has been developed to reflect this ambition, ensuring that we not only meet but exceed the expectations of our stakeholders.

Our strategy is the result of a thorough materiality assessment and extensive stakeholder engagement. This comprehensive approach allows us to understand and respond to our most significant impacts, risks, and, crucially, new opportunities.

Decarbonisation is at the heart of our environmental strategy. We are committed to exceeding future IMO and EU legislation, aiming to achieve Net Zero emissions by 2040.

To achieve this, we are expanding our fleet with vessels that use LNG and biofuels, significantly reducing our carbon footprint. By focusing on our newbuild program, we lower overall emissions through improved efficiency. Investing in technical upgrades and retrofits to existing vessels further enhances efficiency, reducing costs and ensuring full compliance with all legislation.

The interplay between our decarbonisation initiatives and new regulations, such as FuelEU and the EU Emissions Trading System (EUETS), underscores that these efforts are not just morally right but commercially sound.

By positioning ourselves as leaders in minimising environmental impact and operating an environmentally superior fleet, we can support our clients in meeting their regulatory demands and targets while also capitalising on the financial benefits of reduced emissions and increased operational efficiency.

This strategic alignment ensures we remain at the forefront of sustainable maritime transportation, demonstrating that responsible environmental practices and commercial success go hand in hand.

We recognise that our success is intrinsically linked to the well-being, motivation, and safety of our employees.

Our people strategy is built on four fundamental principles. First, we are strengthening awareness of company values and enhancing our culture and leadership. We will continue to evolve our culture through the active involvement of our colleagues. Second, we are motivating and developing our managers and employees by focusing on empowerment and effective role delineation, thereby fostering a robust corporate structure. Third, attracting the best talent is crucial for our success. We are committed to eliminating discrimination and promoting diversity within our workforce, ensuring that it is representative of all sections of society. Finally, providing high-quality operational and personal development training opportunities is essential for maintaining a safe, reliable, and environmentally sound service.

Above all, safety remains our top priority. We are committed to full compliance with all applicable laws and regulations, supported by a clear set of policies. Our commitment to robust safety practices is demonstrated by our ambitious target of zero accidents onboard our vessels.

As we move forward, our evolving ESG strategy will continue to deliver long-term value for stakeholders, foster innovation, and contribute to a more sustainable world.

Thank you for reading, and for your continued support.

Leading the Way



By pioneering use of new, greener, cleaner fuels such as bio-diesel, UECC decreases the environmental impact of operating our legacy tonnage.



First carrier to have dual-fuel LNG PCTCs, and to operate with cleaner fuels such as bio-diesel.

We were also the first in our industry to have three LNG battery hybrid PCTC's.



With our revolutionary LNG Battery Hybrid vessels, we can reduce NOx emission by up to 90%, and we almost entirely eliminate SOx and Particular Matter emissions.



By introducing synthetic and liquified bio methane into our energy mix, we will further improve the already impressive CO₂ reductions afforded by LNG.



We installed Ballast Water Treatment System onboard our vessels well in advance of IMO implementation requirement.



Newbuildings are cold ironing-ready, and we are running cold ironing projects with key ports.



Our History



Nippon Yusen
Kabushiki Kaisha

Owner

NYK owns 100% of UECC

1990 1991

Co-owner

Wallenius Lines
Owns 50% of UECC

WALLENIUS  **LINES**



1. mill

Cars transported

1997



2. mill

Annual volumes
exceed 2 million units

2004

2006



Delivery of LNG vessels M/V AUTO ECO & M/V AUTO ENERGY

Naming Ceremony of M/V AUTO ECO

2010

2016



Bio-fuel

First in our industry to
introduce bio-fuel

2019

2020

2021

2022



New multi- storage garage

Contract signed for
a new multi-storage
garage in Pasajes



Liner trading network

Launched liner trading
network. 32 vessels
reduced to 18 vessels



New LNG battery hybrid vessels

Delivery of
Auto Advance

Delivery of
Auto Achieve &
Auto Aspire

Ordered 3 battery multi-fuel LNG PCTCs,
ensuring that we in July 2022 have the most
environmentally-friendly fleet in our industry

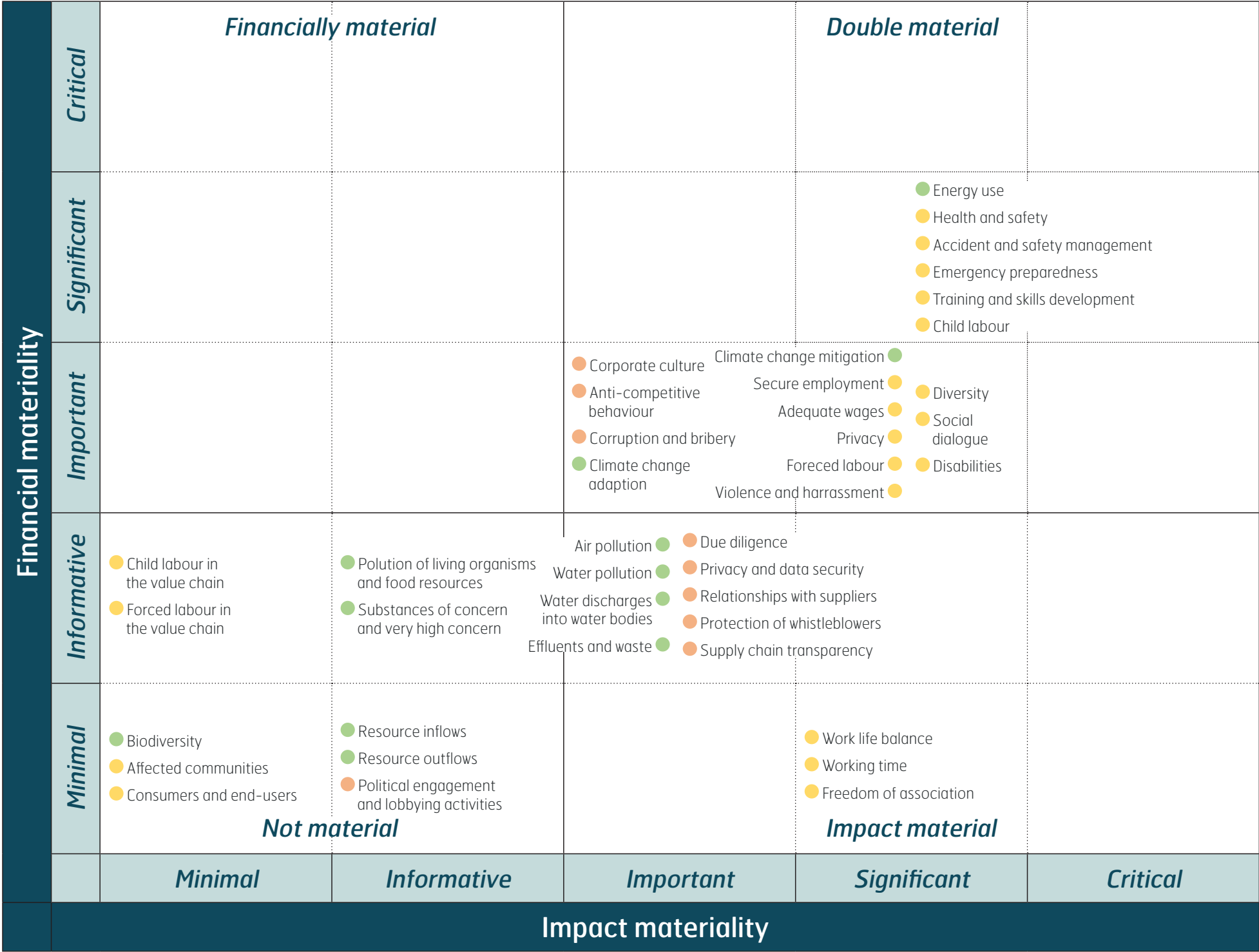


ESG Strategy

Sustainability is the cornerstone and strategic driver for future growth. We aim to be the leading provider of sustainable short sea roll on roll off transportation services in Europe. Our ESG strategy has been designed to reflect this ambition.

Our strategy is built on a rigorous materiality assessment and extensive stakeholder engagement, enabling us to understand and address our most significant impacts, risks, and opportunities. This strategy is designed to create value for our investors, customers, and colleagues.

These inputs have guided us to prioritise our focus in two primary areas: decarbonisation and people.



Our process

Stakeholder engagement

At the core of our sustainability efforts lies a commitment to stakeholder collaboration. Diverse perspectives bring benefits: we engage actively with our stakeholders to gain comprehensive insights that improve our understanding of our business dynamics and relationships.

This collaborative approach not only aligns our strategies with stakeholder concerns and ambitions, but also enhances our ability to tailor services that meet their needs – identifying new opportunities and mitigating any potential risks.

In preparation for the EU’s Corporate Sustainability Reporting Directive (CSRD), we conducted an extensive stakeholder engagement exercise to identify the most critical ESG issues. This exercise included distributing detailed questionnaires and conducting in-depth interviews with both external and internal stakeholders. The range of views obtained from this engagement has been analysed, forming the foundation of our double materiality assessment and informing our ESG strategy.

We maintain continuous engagement with our customers through tender documents and regular surveys. This ongoing dialogue ensures that we remain attuned to their evolving needs and expectations, delivering superior value and maintaining a competitive edge in the market.

Double materiality assessment

A robust ESG strategy begins with understanding the most significant ESG issues. To focus on these most critical aspects, we conducted a double materiality assessment. This method considers both the inward financial impacts of sustainability issues and the outward impacts we have on people and the planet. This comprehensive approach, aligned with the guidance from the European Financial Reporting Advisory Group (EFRAG), ensures we address the most material topics.

From our materiality assessment, we identified climate change, our workforce, and workers in our value chain as key strategic areas. Focusing on these areas will enable us to achieve our sustainability goals.

- Key
- Environmental
 - Social
 - Governance



ESG strategy development

Based on our double materiality assessment and stakeholder engagement, we have pinpointed areas for ESG strategy enhancement. We are setting out strategic ambitions for material areas and preparing for the CSRD by:

- Defining measurable, time-bound, achievable targets, with appropriate milestones.
- Establishing baseline values and a base year for progress measurement.
- Identifying actions required to meet targets and necessary resources.
- Creating processes to track the effectiveness of our actions, including specific Key Performance Indicators (KPIs).
- By continually improving our strategy and processes, we are committed to advancing our sustainability performance and achieving our long-term ESG goals.

People

At UECC, we recognise that our success hinges on our employees' well-being, motivation, and safety. Our people strategy is founded on four key principles:

- Values, Culture, and Leadership: Enhancing awareness of company values and improving our culture and leadership through active colleague involvement.
- Empowerment: Motivating and developing our managers and employees by fostering empowerment, defining effective roles and responsibilities, and benefiting from a robust corporate structure.
- Recruitment: Attracting the best talent by eliminating discrimination and promoting diversity. We aim for a workforce representative of all societal sections, where every employee feels respected and capable of performing at their best.
- Training: Providing high-quality operational and personal development training to ensure a well-trained professional workforce capable of delivering safe, reliable, and environmentally sound transportation services.

Above all, we are steadfast in our commitment to safety. We comply fully with all applicable international regulations and have clear policies to ensure compliance.

Decarbonisation

Our decarbonisation efforts are centred on our fleet, aiming to exceed future IMO and EU legislation and achieve Net Zero emissions by 2040. This year, we have designed a comprehensive decarbonisation roadmap detailing our path to Net Zero by 2040. Please refer to the environmental section of this report for further details.

To meet our decarbonisation goals, we will:

- Increase LNG and Biofuel Usage: We are expanding the number of vessels using LNG and biofuels to significantly reduce our carbon footprint.
- Cold Ironing Capabilities: We will collaborate with partners to introduce cold ironing across our fleet and ports, allowing vessels to shut down their engines and connect to shore power while docked, thus reducing emissions.
- Economies of Scale: Through our newbuild program, we will focus on scaling up vessel size to improve fuel efficiency and reduce overall emissions.
- Technical Upgrades and Retrofits: We are investing in continuous technical upgrades and retrofits for existing vessels to enhance efficiency, reduce fuel costs, and ensure compliance with all regulations.
- New Service Offerings: We are developing new services that leverage emerging environmental legislation to enhance our sustainability profile and commercial edge.

These initiatives are aimed at operating an environmentally superior fleet, thus realising the commercial advantages that accompany such achievements.



AUTO ECO
MADEIRA

IMO 9736365

Environmental Performance and Sustainability Initiatives

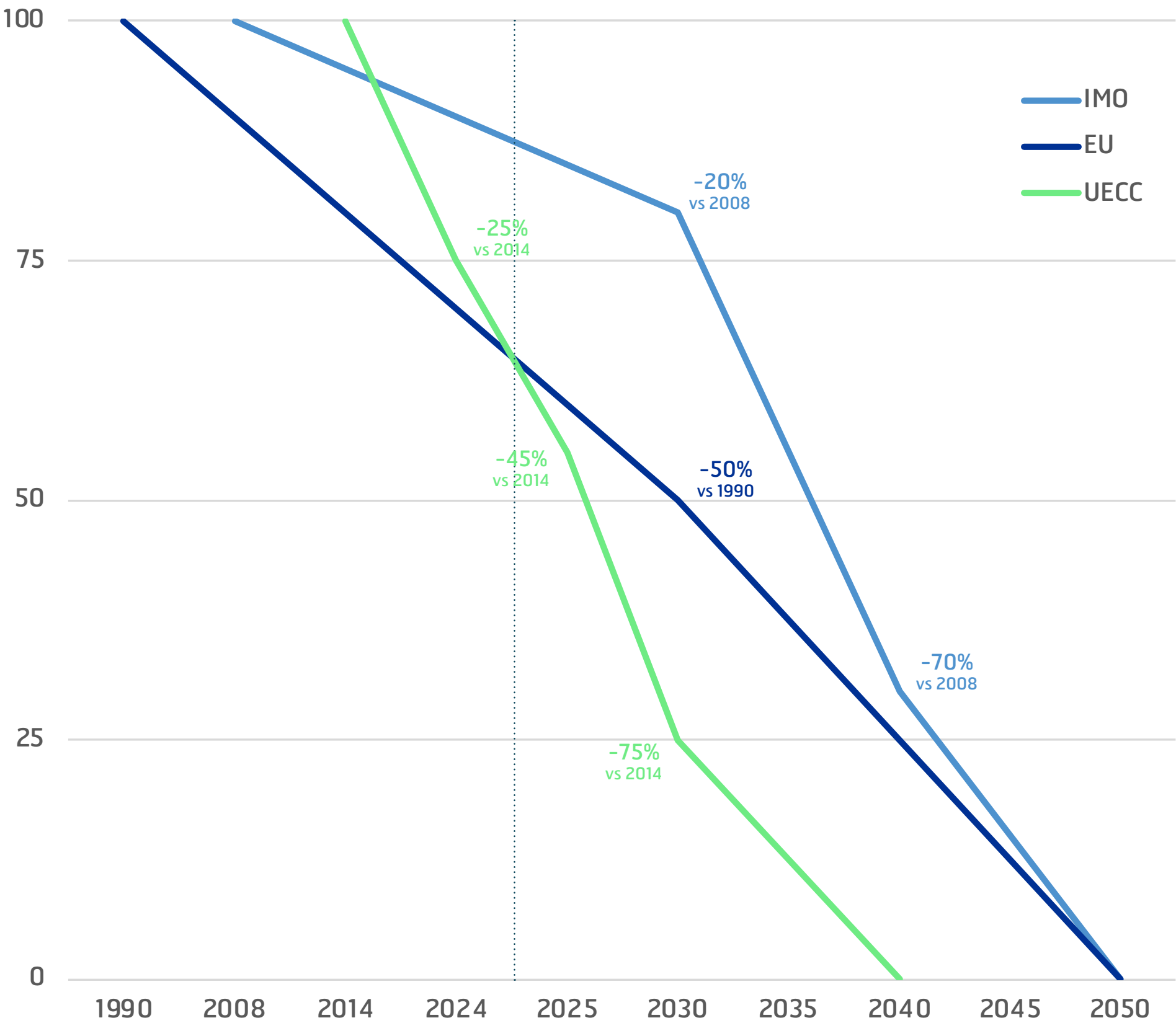
We recognise our crucial role in the global supply chain and the corresponding responsibility to mitigate our environmental impact. This section outlines our comprehensive sustainability strategy, key metrics, and initiatives designed to promote environmental stewardship, enhance operational efficiency, and align with global climate goals.

While the global regulation needed to bring in seismic industry changes has been slow in coming, we recognise that climate change is an urgent issue. We cannot wait to be governed by legislation – this is why we have taken immediate and implementable steps now.

Highlights

- Tank to wake emissions reduction of 60,000 tonnes across the 13 vessel fleet in 2023, the use of biofuel accounted for 40,000 tonnes of reduction, the remaining 20,000 tonnes is due to our use of LNG. This is a massive 250% increase in decarbonisation from 2022 (24,200 tonnes emissions reduction in 2022).
- Signed a 7-year biofuel deal
- 30% of our vessels currently operate using biofuel, a 12% increase from 2022
- We used 14,000mt of ISCC-certified sustainability biofuel B100, a 115% increase since 2022
- We have built strong partnerships with an engine builder and a biofuel supplier to test the feasibility of cashew nut shell liquid as a marine biofuel.
- 85% of our vessels in the fleet have a C-rating on the IMO's CII, we expect that all vessels will achieve at least a C in 2024.
- We already run a surplus in relation to Fuel EU which requires a 26% reduction in emissions intensity by 2040.
- In the last 7 years we have built 5 eco-friendly newbuilds, 2 dual-fuel LNG vessels, and 3 multi-fuel LNG Battery Hybrid vessels. Battery-hybrid vessels already exceed the IMO target to reduce carbon intensity by at least 40% by 2030.
- Our use of LNG has reduced our CO₂ emissions by 25%, SO_x & Particulate Matter by 90% and NO_x by 85% since 2008 levels.
- 100% vessels have ballast water exchange or treatment
- No spills to the environment

UECC GHG emissions reduction targets vs, IMO and EU regulations



Our Climate Strategy

Our sustainability strategy is built on three main pillars: decarbonisation, operational efficiency, and innovation in fuel technologies. Our aim is to be industry leaders in reducing greenhouse gas emissions, optimising resource use, and adopting sustainable practices across our operations.

Decarbonisation roadmap

- 2023: Signed a 7-year biofuel deal to integrate renewable energy sources into our operations.
- 2025: Aim for 10% of our gas demand to be met by renewable biomethane.
- 2030: Achieve a minimum 45% reduction in carbon intensity, surpassing IMO targets.
- 2035: Implement fleet-wide cold-ironing capabilities and introduce our first zero-emission ship.

Alternative fuel roadmap

To achieve our ambition of using alternative fuels, we have established several milestones:

- 2020: Began our biofuel programme.
- 2025: Aim for 22% use biofuel and 20% use of LNG across our vessels.
- 2030: Aim for 23% use of Liquefied Bio Methane, 36% use of biofuel and a 23% use of LNG across our vessels.
- 2035: Introduction of onshore power supplies and e-LNG.
- 2040: Phase out of fossil fuels.



The Pillars of Our Climate Strategy

Pillar 1:

Decarbonisation efforts

– Our roadmap to net zero

Our commitment to sustainability is demonstrated by our aggressive target of reaching Net Zero emissions by 2040. This ambitious goal positions us ahead of regulatory requirements and industry peers, ensuring we remain a preferred partner for sustainable transportation services. Our decarbonisation roadmap is designed to meet and exceed industry regulations and best practices, including the carbon intensity limits set by FuelEU.

We have successfully integrated biofuels into our logistics operations, notably partnering with Svitzer to use carbon-neutral biofuels in towage operations. This partnership alone is projected to cut CO₂ emissions by more than 300,000 kilograms over the contract term.

The PCTC vessel Autosky achieved a 60% reduction in annual carbon intensity through the use of biofuels over a two-year period. This effort aligns with our broader goal to exceed the International Maritime Organisation's (IMO) 40% carbon intensity reduction target by 2030.

Pillar 2:

Operational efficiency

Energy efficiency:

Our approach includes implementing energy-efficiency measures onboard all our vessels. This includes waste heat recovery systems, air lubrication systems, high-efficiency anti-fouling coatings, and advanced hull designs. We also aim to optimise ship operations through advanced voyage planning, speed management, and route optimisation. Our new build program is focused on acquiring larger A and E class vessels to achieve economies of scale and further reduce emissions per ton-mile.

Port electrification and shore power:

Cold ironing at ports allows vessels to turn off their engines and connect to the local power grid, significantly reducing emissions while at berth. We are actively promoting electrification infrastructure at ports and advocating for the use of renewable energy sources to further decrease emissions during docking.

Pillar 3:

Innovation in fuel technologies

We have made significant progress in switching to cleaner transition fuels such as LNG and biofuels. Future investments will focus on retrofits and new builds that can utilise these cleaner fuels up to 2030. Beyond 2030, we are exploring zero-carbon fuels like hydrogen and ammonia to eliminate our reliance on carbon-intensive fuels.

UECC is now looking at sourcing alternative carbon-neutral fuels such as bio-LNG and e-LNG for these vessels to further improve their green performance. UECC has sought to take a leading role through early-stage analysis of new biofuels to evaluate their potential in terms of technical suitability, sustainability, and commercial viability, both to deliver the best solution for our customers and to provide the sector with a blueprint for the assessment and adoption of such fuels based on these three pillars. The company seeks biofuels with the biggest environmental impact, aiming for a typical minimum 90% reduction in GHG intensity from well-to-wake compared with conventional marine fuels.

Actions:

In order to hit our ambitious decarbonisation targets we will focus on three areas:

Alternative fuels: As a pioneer in sustainable shipping, we have already made impressive progress switching to cleaner transition fuels such as LNG and biofuels, with 30% of our fleet already using biofuels, this is due to increase to 50% in 2024. We will make further investments in to retrofits and new builds which can take advantage of these cleaner fuels up to 2030. We are exploring ways to progress further by employing zero carbon fuels.

Energy efficiency: We will introduce energy-efficiency measures onboard all our vessels such as waste heat recovery systems, air lubrication systems, high efficiency anti fouling, and advanced hull designs. We will also optimise ship operations through advanced voyage planning, speed management and route optimisation. Our new build programme focuses on bringing economies of scale to our operations through the acquisition of larger vessels.

Port electrification and shore power: Cold ironing at ports allows vessels to turn off their engines and connect to the local power grid, reducing emissions while at berth. To enhance our cold ironing abilities, we are promoting electrification infrastructure at ports. Further to this we are promoting the use of renewable energy sources for ports, which will further reduce emissions while at berth.

Tracking progress:

To ensure we are on track to meet our decarbonisation targets, our Business Planning team conducts monthly monitoring of key sustainability initiatives. This includes regular tracking of the Carbon Intensity Indicator (CII) to measure and manage our carbon efficiency, monitoring compliance with the EU Emissions Trading System (ETS), tracking biofuel consumption to ensure we meet our renewable energy targets, and measuring progress in reducing CO₂ emissions. We also periodically report emission information to stakeholders to maintain transparency and accountability.



Sail for Change

We are proud to introduce a new initiative called Sail for Change, which allows car manufacturers to transport their vehicles on vessels powered by renewable fuels. The program offers a significant opportunity for customers to positively impact their maritime supply chain by transitioning to sustainable fuels.

One of the first major steps in this initiative is Green Gas Month, during which we will use bioLNG, primarily supplied by Titan Clean Fuels, across all five of our dual-fuel car carriers.

These carriers, which include two dual-fuel LNG pure car and truck carriers (PCTCs) and three multi-fuel LNG battery hybrid PCTCs, will refuel at the Zeebrugge port with biofuel derived from highly sustainable feedstock.

This switch is expected to reduce carbon emissions by over 8,000 metric tonnes of CO₂ equivalent (CO₂e) in the first month alone.

The program helps customers support a fuel change that directly reduces the emissions of their transported goods. We have prioritised developing a process which aligns with customers. The scalability of the program means customers can participate according to their specific needs.

The goal of this programme is to allow clients to demonstrably reduce their scope 3 emissions through targeted, scale and verifiable measures.

Independent CO₂ registry

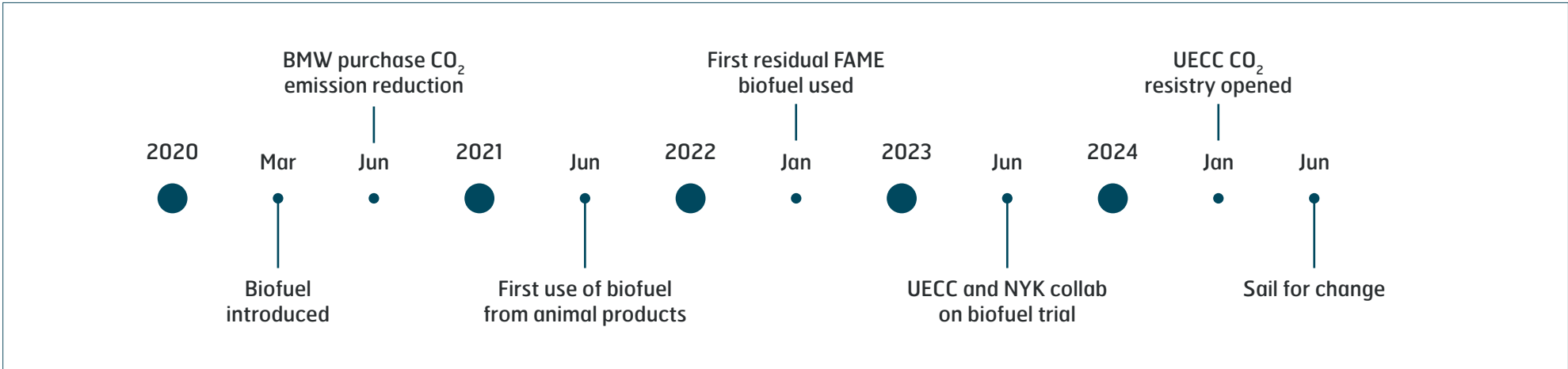
To provide customers with full traceability of the fuel change impact, we have created of an independent CO₂ registry. This registry, audited and verified by an independent ISCC auditor, quantifies the CO₂ reduction for each client on each voyage and provides certification. This ensures transparency and accountability in our shared sustainability efforts.

Industry bio-fuel blueprint

We aim to set the industry standard for best practices. Sail for Change is a central part of our broader decarbonisation strategy. To understand the impact of bio-fuels on decarbonisation, they need to be thoroughly analysed. Therefore, we have created a comprehensive blueprint for the industry to identify, evaluate, and test promising bio-fuel feedstocks.

Effective decarbonisation can only be achieved through collaboration with all stakeholders.

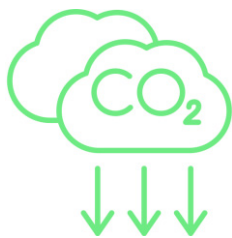
In March 2024, we partnered with Lloyd's Register Fobas, Wartsila, and ACT Group to assess a biofuel made from cashew nut shell liquid (CNSL). By directly working with critical partners – including engine manufacturers – we can make practical and scalable impact, moving towards our shared goals together.



UECC Strategy



Progressing investment in alternative fuels



Fleet-wide reduction in emissions

UECC x Customer Collaboration



Target alignment with customers



Fuel switch takes place onboard



Cargo carried with renewable fuels

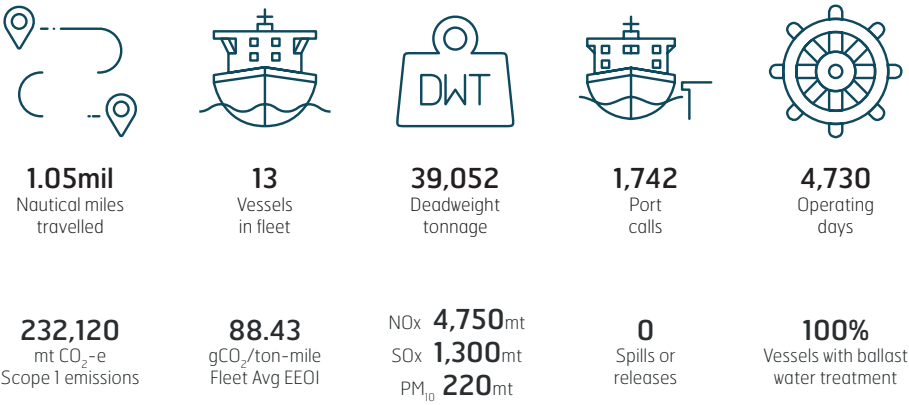


Impact statement delivered



Environmental Performance

During 2023 our efforts to reduce Scope 1 and Scope 2 emissions have already yielded significant results. We have focused on a range of initiatives in our journey to net zero including investments in new vessels and technologies, the introduction of alternative fuels to our vessels and working with external partners and our own crew to effectively develop and implement these innovative decarbonisation programmes. We are proud of efforts throughout the year and decarbonisation will continue to be a core focus for UECC for many years to come.



Improving efficiency

Achieving operational efficiency is a cornerstone of our climate strategy, ensuring that our fleet operates at peak performance while minimising environmental impacts now, and in the future.

Our approach involves a combination of cutting-edge technology, best practices in fleet management, and continuous improvement processes to enhance fuel as vessel use efficiency.

The Annual Efficiency Ratio (AER) serves as a key metric for assessing the carbon intensity of our vessels. This year, we have recorded an AER of 5.85, marking our inaugural measurement of this indicator and establishing a baseline for future enhancements.

The EEOI of our fleet, which quantifies the actual fuel efficiency across our vessels, stands at 88.43 gCO₂ per ton-mile. This measurement provides a practical evaluation of our operational performance in terms of carbon emissions per unit of cargo transported.

In addition, the Energy Efficiency Design Index (EEDI) measures the theoretical efficiency of the newer vessels in our fleet. Our EEDI has remained consistent at 14.83 gCO₂ per ton-mile, reflecting the design and technological advancements incorporated in our recent fleet additions.

The interaction between AER, EEOI, and EEDI is crucial in understanding and managing our fleet's overall efficiency. While AER provides a broad measure of carbon intensity, EEOI offers insight into real-world operational efficiency, and EEDI focuses on the design efficiency of newer vessels. Together, these indicators form a comprehensive framework for evaluating and improving our environmental performance, guiding our strategic initiatives to reduce carbon emissions and enhance fuel efficiency across our fleet.

All three figures align with industry benchmarks, demonstrating our commitment to maintaining competitive efficiency standards.

Decarbonisation

Our top-line Gross Global Scope 1 CO₂ Emissions fell by 15.6%, from 268,250 in 2022 to 232,120. This reduction must be considered in relation to our fleet size and composition. In 2023 our fleet size fell by four vessels, from 17 to 13.

Understanding this decrease in relation to our operational efficiency figures provides a much more accurate assessment of our impact.



Alternative fuels

Our commitment to sustainable shipping is exemplified by our strategic adoption of liquefied natural gas (LNG) and other biofuels. UECC's adoption of biofuels has expanded exponentially since the programme was launched in 2020 with piloting the use of biofuel on its vessel Autosky, bolstered by valuable support from owners of its time-chartered vessels, clients, fuel suppliers, industry partners, and our investors. Thanks to these efforts we have made significant progress in the adoption of alternative fuels in 2023. 30% of our fleet now uses biofuels, up from 18% in 2022 and we are on track to hit our target of 50% of our fleet using green fuel in 2024 and 80% by 2030.

- Liquefied natural gas: LNG, as a cleaner alternative to traditional marine fuels, significantly reduces GHG emissions as well as sulphur oxides (SOx), nitrogen oxides (NOx), and particulate matter emissions, aligning with our goal to minimise environmental impact.
- Biofuels: We are exploring advanced biofuels, which offer even greater potential for reducing carbon emissions. These fuels, derived from renewable biological sources, provide a sustainable pathway to decarbonise our operations. In 2023 we partnered with the biofuel supplier ACT Group as part of an industry collaboration to test the Cashew Nut Shell Liquid (CNSL)-based biofuel FS.100
- Fuel sourcing: We have developed strong partnerships with suppliers of biofuels, in 2023 we signed a 7-year biofuel supply contract, ensuring we are able to integrate renewable energy sources into our operations for years to come.

Advanced technologies

Vessel efficiency is one of the most important factors when considering decarbonisation in the maritime industry. Not only does better fuel efficiency mean reduced emissions, but also reduced fuel costs, saving us and our clients' money. In the pursuit of vessel fuel efficiency, we have ongoing projects to integrate advanced technologies across our fleet: -

- Waste Heat Recovery Systems: These systems capture exhaust heat from the engine and convert it into additional energy, reducing overall fuel consumption and emissions.
- Air Lubrication Systems: This technology creates a layer of air bubbles along the hull, reducing friction and leading to lower fuel consumption and emissions.
- High-Efficiency Anti-Fouling Coatings: These coatings prevent marine organism buildup on hulls, minimising drag and improving fuel efficiency.
- Advanced Hull and Propeller Designs: Our new builds feature optimised hull and propeller designs to reduce resistance and improve fuel economy.
- Energy-Efficient Engine Technologies: Incorporating the latest engine technologies, such as dual-fuel engines and hybrid propulsion systems, allows us to achieve significant fuel savings and emissions reductions. To date three of our vessels have been fitted with LNG-Battery hybrid engines.
- Cold ironing in port: By connecting our vessels to shore-based electrical power while at berth, we significantly reduce emissions from auxiliary engines, improving air quality in port areas and contributing to our overall emissions reduction.



Utilisation and vessel optimisation

We employ sophisticated software and best practices to optimise voyage planning, speed management, and route optimisation:

- Voyage Planning: Using advanced weather routing software, we plan efficient routes to avoid adverse conditions, saving fuel and reducing emissions.
- Speed Management: Implementing slow steaming and other speed management practices balances timely deliveries with fuel conservation.
- Route Optimisation: Real-time monitoring and adjustments ensure vessels take the most efficient paths, reducing travel time and fuel consumption.

Fuel optimisation across our entire fleet is achieved through the implementation of cutting-edge technologies and best practices. By leveraging data analytics, we optimise fuel consumption and operational performance, ensuring that our fleet remains at the forefront of sustainable shipping practices.

Effective fleet management is crucial for maintaining operational efficiency:

- Fuel Monitoring: Advanced systems provide real-time data on fuel consumption, enabling prompt corrective actions.
- Maintenance Schedules: Regular maintenance prevents inefficiencies, keeping vessels in optimal condition.
- Performance Tracking: Monitoring key performance indicators (KPIs) such as fuel consumption and emissions enables data-driven decisions and continuous improvement.

Future-proof vessel design

Designing vessels that are future-proof is essential to our sustainability strategy. Our newbuilds incorporate advanced technologies and design features that enhance fuel efficiency and reduce emissions. By prioritising adaptable designs, we ensure that our vessels can accommodate future technological advancements and regulatory changes.

- Newbuilding programme: We are integrating larger A-Class vessels that capture economies of scale and deliver fuel efficiency gains beyond 2022.
- Advanced design: All newbuild vessels will be designed with future-proof technologies, incorporating advanced propulsion systems and energy-efficient designs such as cold ironing capabilities.

Preparing our crew for energy transition

Our crew members are the foundation of our operations. Through rigorous and effective training, we are able to ensure that we are able to provide efficient and safe services to our clients. Looking forward to 2024 and to ensure compliance with upcoming regulations we are developing systems to track the hours and type of training delivered to each our employees. Our crew training programme covers the following topics:

- Energy-Efficient Navigation: Training covers how to navigate efficiently, considering weather, currents, and tides to optimise fuel use.
- Fuel Management: Crew members learn to monitor and optimise fuel consumption effectively using onboard systems.
- Technology Utilisation: Regular training ensures proficiency in using advanced technologies onboard.

Measurement of scope 1, 2 and 3 emissions

Accurate emissions monitoring and measurement are crucial for meeting regulatory requirements such as FuelEU and the EU ETS. We already employ advanced Scope 1 and 2 measurement and reporting techniques both on our vessels and on shore.

- Monitoring on vessels: We utilise a comprehensive ship dashboard to display key performance indicators (KPIs) related to emissions and sustainability. This allows us to optimise our vessel operations in line with emissions targets.
- Monitoring on shore: We rigorously measure our emissions against a monthly budget. This approach enables us to track our progress in real-time and make data-driven decisions to stay within our emissions targets.
- Scope 3: We are also incorporating Scope 3 emissions into our tracking systems to provide a complete picture of our environmental impact.

Collaboration and Partnerships

By building strong partnerships with technology providers, research institutes and other industry partners, we continue stay at the forefront of innovation, demonstrating our dedication to environmental stewardship, We have also partners with our stakeholders ensuring that our sustainability initiatives are both impactful and aligned with their broader goals:

- **Alternative Fuels:** Partnerships with biogas suppliers, produced from organic waste, offers us a sustainable alternative to fossil fuels.
- **Technology Providers:** Throughout the year we have been working with a leading marine engine manufacturer and a P&I club to test innovative engine designs that are capable of running with new lower carbon fuels. As part of this process, we are collaborating with partners to design a standardised processes for the assessment of new fuels in the future. This work will serve as a blueprint for the development of future zero carbon fuels in the maritime sector.
- **Research Institutions:** Collaborations with partners such as the Goodshipping Program allows participation in studies and trials of new technologies and practices.
- **Industry Partners:** Sharing knowledge and best practices with other industry leaders advances operational efficiency in the maritime sector. Conduct sustainability workshops with all the major customers to identify the alternative fuel types used in operation historically and show what could happen in the future.
- **Value Chain Partners:** We are working with partners at port terminals to adapt infrastructure to support EV handling abilities. We also work with partners to encourage the development of cold ironing capabilities and the use of renewable energy at port.
- **Stakeholders:** Leveraging biofuel as a core component of our strategy, we have implemented the Envirosense program, a comprehensive system designed to register and verify emissions reductions. Through this program, emissions reductions are documented and certified, allowing us to offer these reductions to our customers via a book and claim system. This approach not only facilitates verified CO₂ reductions but also enables us to realise the value in our biofuel programme, reflecting its environmental benefits.



Climate risk

The identification and management of climate risk is crucial as it enables us to mitigate the adverse impacts of climate change on our company and our value chain. By understanding these risks, we can develop an effective strategy to reduce vulnerabilities in our operations and enhance resilience in our strategy. Through understanding climate risks, we are also able to identify areas of new opportunity, ensuring we are able to deliver the services our clients need well into the future.

During the year we have performed a high-level assessment of climate risks and opportunities. We assessed the severity and likelihood of these risks; through this we can understand which risks and opportunities are most salient to UECC. The assessment looked at a broad range of climate-related physical risks, transition risks and climate opportunities. We will continue to develop our climate risk identification and management processes over the coming year ensuring we are in line with TCFD recommendations and ready for CSRD reporting. Based on our assessment the most pertinent risks and opportunities we identified are below.

Future enhancements

In the coming year, we will be enhancing our climate risk identification and management processes to be fully aligned with TCFD recommendations and CSRD requirements. To do this we will implement the following steps:

- 1. Formalise the governance structures around the identification and management of climate risk
- 2. Enhance our climate risk assessment processes
- 3. Explore how identified risks and opportunities affect our business model and strategy, including a scenario analysis
- 4. Develop metrics and targets for the assessment and management of climate risk

	Risk	Description	Reason	Actions
Physical risk	Increased frequency and severity of acute weather events	Increasing severity of cyclones, hurricanes, typhoons and tornadoes due to climate change leading to the damage of assets or interruption of operations.	Increasingly frequent severe weather events could cause damage to our vessels and avoidance will lead to additional fuel use.	We are investing in advanced weather routing software across our fleet to plan efficient routes avoiding adverse weather.
	Carbon pricing mechanisms	Implementation of carbon taxes and other pricing mechanisms in response to climate change.	Increased carbon taxes are being levied on the maritime sector (EU ETS & FuelEU), if we do not respond this will lead to additional expenditure.	We are investing in energy efficient vessel technology and the use of low and zero carbon fuels. This will reduce our exposure to carbon taxes.
Transition risk	Enhanced emissions reporting obligations	Implementation of stricter emissions regulations in response to climate change.	Heightened reporting requirements and scrutiny require additional resources to comply with. Non-compliance could lead to fines or penalties.	We monitor in real time our vessel emissions and report in line with MRV regulations. We are forward leaning on all forms of environmental reporting.
	Regulation of existing goods and services	Heightened regulations on the services the company can offer, or the good and services they rely on to operate.	Increased regulations on goods and services could increase the price of good and services we rely upon to operate (e.g. our fuel) .	We are exploring the use of LNG and biofuels to ensure a reliable supply of clean fuels in the future.
Opportunities	Participation in carbon markets.	Opportunities arising from an effective carbon trading strategy.	The development of carbon markets in the shipping sector could lead to the development of new products and services which we could provide.	We have developed in-house solutions to the EU ETS making us a preferred partner for charterers. We are already compliant with the FuelEU meaning we can leverage the financial incentives associated with the Fuel EU.
	Use of more efficient modes of transportation.	Use of alternative fuels, leading to advantages such as the avoidance of carbon taxes.	A global shift towards using efficient modes of transportation creates additional demand for green shipping which we could provide.	Throughout investments in our fleet and our newbuild programmes we are well places to be the preferred partner for clients seeking a low carbon shipping solution.



Environmental Management

Air pollution

Air emissions from shipping have a significant negative impact on human health and the environment. In response, we have adopted a holistic approach to managing air pollution, underscoring our commitment to environmental stewardship.

Our efforts to mitigate air emissions involve investing in advanced emission control technologies and transitioning to cleaner fuels. These initiatives help reduce our production of ancillary emissions. We strictly adhere to stringent international regulations, including the International Maritime Organisation's IMO 2020 guidelines, which aim to significantly reduce the maritime industry's contribution to air pollution.

We are also committed to establishing and tracking targets to measure the effectiveness of our mitigation efforts. The following data illustrates our recent progress in reducing key pollutants:

- Nitrogen Oxides (NO_x , excluding N_2O):
We achieved a reduction from 5,029 tonnes in 2022 to 4,750 tonnes in 2023, marking a decrease of 279 tonnes or 5.9%.
- Sulphur Oxides (SO_x):
We recorded a slight increase from 1,238 tonnes in 2022 to 1,300 tonnes in 2023, amounting to a rise of 62 tonnes or 4.8%, this is attributed to operational adjustments and the balancing of our fleet's fuel mix.
- Particulate Matter (PM_{10}):
We reduced emissions from 224 tonnes in 2022 to 220 tonnes in 2023, a decrease of 4 tonnes or 1.8%.

These figures are a testament to our ongoing commitment to reduce our environmental footprint and improve air quality. We continue to refine our strategies and invest in technologies that will further decrease emissions across our operations, demonstrating our dedication to a sustainable future for global shipping.



Water pollution

There are two primary types of ballast water management systems: D1 and D2 systems.

The D-1 system relates to ballast water exchange and requires ships to exchange at least 95% of ballast water far from the coast. This method uses a physical filtration method, however their effectiveness can vary based on various conditions.

The D-2 method requires treatment of the water to remove bacterial and other organic matter. This provides a higher level of efficacy in removing harmful environmental impacts.

The IMO Ballast Water Management Convention states that all ships must meet the D-2 standard by 2024. In line with this regulation, 100% of our fleet is fitted with ballast water treatment systems.

Hazardous substances

We aim to exclusively use environmentally friendly chemicals onboard our fleet, and we actively challenge our time-charter parties to adhere to the same standards. We are focused on improving the utilisation of the port garbage matrix to ensure efficient waste management and are pressing our suppliers to minimise plastic packaging and wrapping.

We uphold a strict policy of zero tolerance for oil spills.

Through these initiatives, we aim to set a benchmark for environmental responsibility in the shipping industry.



Environmental Regulation and Compliance

Starting in 2024, the shipping industry faces increasingly stringent environmental regulations designed to accelerate the transition to low-carbon and alternative fuels while ensuring high-quality, transparent ESG disclosures for investors and stakeholders.

The three regulations with the highest impact for UECC are the EU Emissions Trading System (EU ETS), FuelEU, and the Corporate Sustainability Reporting Directive (CSRD).

Compliance with these regulations is mandatory; however, only adhering to them will not set us apart or provide significant benefits. We have strategically chosen to adopt a proactive and forward-thinking approach, using these regulations as a framework to deepen our understanding of our global engagement and impact. This approach will not only enhance our operations but also solidify our position as industry leaders.

We recognise that increased scrutiny of a company's environmental impact is a global phenomenon, affecting all sectors. This shift represents a fundamental change in how business is conducted worldwide: we welcome these regulatory changes and view them as a significant opportunity to demonstrate our commitment to sustainability.

EU Emissions Trading System

The EU Emissions Trading System (EU ETS) for shipping is a regulatory framework designed to cap and reduce greenhouse gas emissions from maritime transport within the European Union. This system incentivises the adoption of cleaner and more sustainable practices within the industry by requiring vessels traveling in EU waters to pay a price for the carbon they emit. The ultimate goal is to drive significant reductions in emissions across the maritime sector.

As ship owners, we bear the responsibility of complying with this regulation on behalf of all members of our value chain. By proactively managing our emissions, we can create opportunities that benefit our customers, helping them to reduce their carbon footprint and meet regulatory requirements more efficiently.

In 2023, we achieved a significant milestone by reducing our CO₂ emissions by 60,000 tonnes. This reduction not only underscores our commitment to sustainability but also has a direct financial impact on our customers. By lowering the amount of carbon emissions, our customers need to purchase fewer carbon credits to remain compliant with the EU ETS, resulting in substantial cost savings.

We continue to lead the industry in sustainability through various thought leadership initiatives. These include hosting webinars and educational sessions to inform our partners about the regulatory landscape and best practices for compliance. By providing valuable insights and up-to-date information, we ensure that all our stakeholders are well-informed and prepared for the challenges and opportunities presented by evolving sustainability regulations.

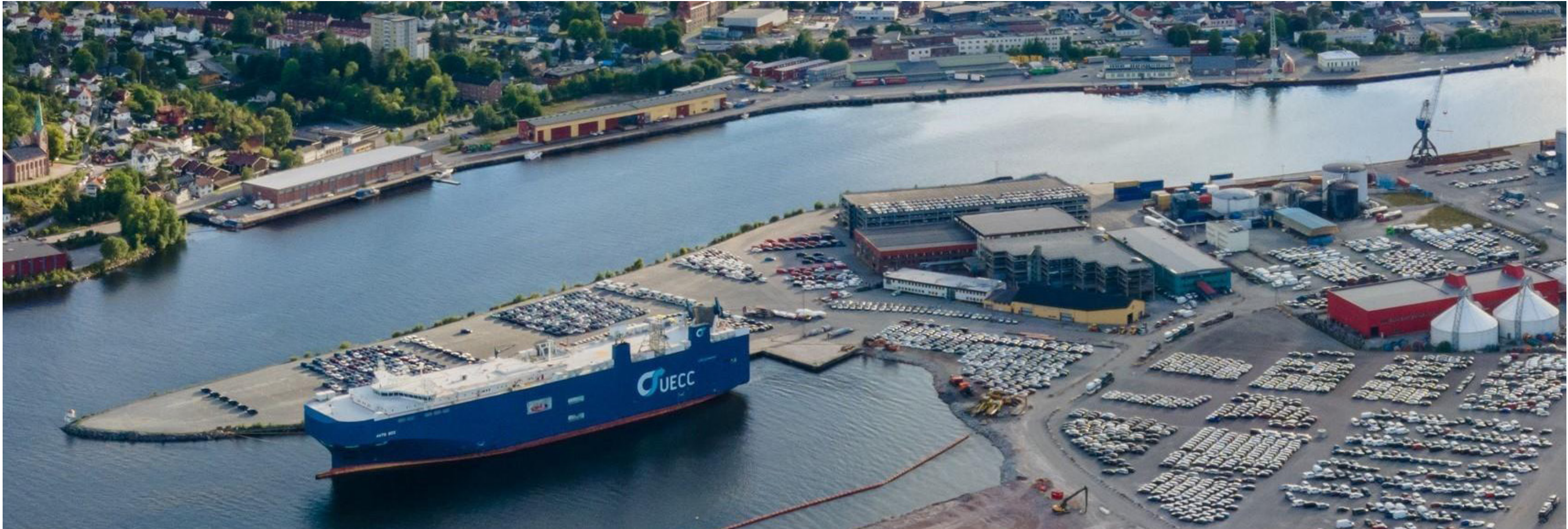
CSRD

The CSRD represents a significant shift in sustainability disclosure regulations within the EU. It aims to enhance transparency in ESG reporting, elevate the quality of reporting to the level of financial reporting, and standardise ESG reporting practices. This regulation requires companies to comprehensively understand and report on material impacts, risks, and opportunities across a broad spectrum of ESG topics, extending beyond climate change.

UECC will fall under the scope of the CSRD in 2026. By gaining insights into our impacts, risks, and opportunities, we can pinpoint strategic priorities and develop strategies to mitigate risks and capitalise on opportunities. This process enables us to transparently demonstrate our leadership in ESG practices to our stakeholders.

We have completed the initial step of the CSRD by conducting a double materiality assessment.

In 2024, we will advance our CSRD implementation by identifying material impacts, risks, and opportunities, further reinforcing our commitment to sustainable business practices and proactive ESG disclosure.



FuelEU

FuelEU Maritime is a regulation introduced by the European Union to drive decarbonisation in the shipping industry, complementing the EU Emissions Trading System (EU ETS). While the EU ETS imposes costs on vessels emitting high levels of greenhouse gases, FuelEU Maritime focuses on rewarding vessels with low carbon intensity and promoting the use of sustainable fuels.

The FuelEU regulation sets an energy intensity cap for vessels trading within the EU. This cap represents the maximum allowable energy consumption per transport work, incentivising vessels to operate more efficiently and use cleaner fuels. Vessels that exceed this cap face financial penalties.

Conversely, vessels that stay below the cap can benefit commercially by joining pooling arrangements. These arrangements allow multiple vessels to collectively meet the energy intensity limit, thus avoiding penalties.

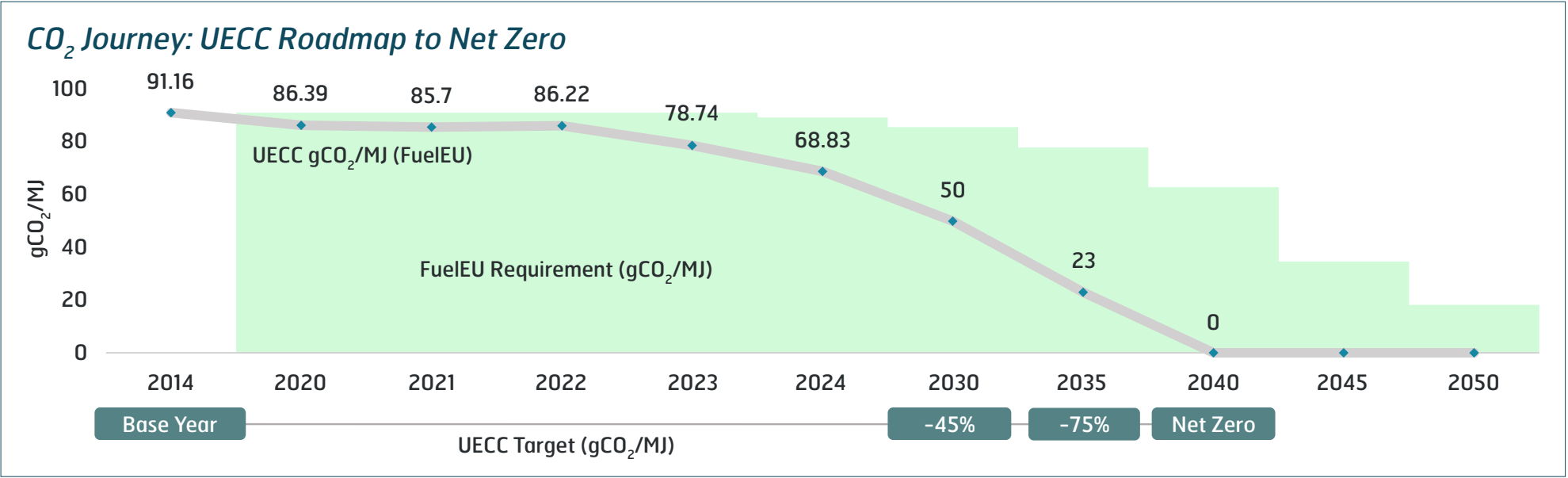
The regulation incentivises investment in advanced low-carbon technologies, such as biofuels.

We are making vast investments in energy-transition. An indirect benefit of this is our vessels are positioned to achieve compliance with FuelEU standards until at least 2034.

For our customers, hiring a FuelEU-compliant vessel means a reduced risk of penalties and potential cost savings.

This compliance not only helps the environment and provides cost savings, but also allows us to access commercial benefits. By participating in pooling arrangements, we have the ability to sell our ‘over-compliance’ to vessels that do not comply.

The graph demonstrated our trajectory for fuel efficiency against the regulatory compliance limit.





Social

The EU CSRD is set to come into force in 2024. Part of this regulation will require companies to disclose a wide range of policies, initiatives and activities related to the workforce, including gender pay gap percentage, training and skills development activities, actions to improve workers' lives, and details of disability inclusion initiatives. We are preparing for this upcoming regulation and collaborating with internal and external partners to ensure we meet the compliance requirements effectively and uphold our commitment to responsible business practices.

Highlights

- 100% employees covered by our health and safety management system
- 0 fatalities, 2 recorded work-related accidents
- 63 days lost as a result of work-related ill-health, accidents or fatalities
- 0 marine casualties
- <10 conditions of class across the whole fleet
- 33% of management positions held by females, well above the 5% industry average
- Ratio of highest earning individual to median compensation is 1 : 0.32
- Annual Personal Development Plan available for all employees
- No reported incidents of discrimination or harassment in the year



198
Seagoing
employees



84
Shore-based
employees

0 Marine casualties

2 Recordable work related accidents

63 Days lost to work-related injuries



Our social strategy

Our social strategy emphasises the health, safety, and well-being of both our workforce and the workers within our value chain, aiming to develop and maintain a supportive and secure environment for all.

To achieve this, it is vital that we build a strong corporate culture focused on our people, prioritising their wellbeing and safety.

To extend this commitment throughout our value chain, we collaborate closely with our partners and suppliers, requiring adherence to our stringent health and safety standards. We conduct regular audits and provide support to help our partners enhance their understanding of our code of conduct and expectation. Through this continuous improvement and collaboration, we strive to set a standard of excellence in worker well-being across our entire value chain.

We advocate for fair labour practices, ensuring that all workers receive fair wages, safe working conditions, and opportunities for professional growth.

By fostering a culture of health and safety, we aim to not only protect our workforce but also to enhance productivity and job satisfaction. Our strategy is built on the belief that a healthy and safe working environment is fundamental to achieving long-term success and sustainability in our industry.

Our social strategy revolves around four principles:

- Informed involvement of our people and leadership
- Empowerment of employees and managers
- Diverse recruitment
- Effective and relevant training

Alongside our corporate culture strategy, we also place particular emphasis on health and safety. We:

- Ensure compliance with all applicable international rules and regulations
- Incorporate a clear set of policies to ensure compliance
- Target zero accidents onboard UECC vessels



Our People

Health and safety welfare

At UECC, we prioritise the health, safety and welfare of our employees. We are committed to providing a safe and healthy work environment where every employee feels protected and supported, able to perform their duties to the highest standard without fear of risk or injury. Our comprehensive health and safety protocols are designed to prevent accidents, injuries, and occupational hazards. We adhere to all relevant regulations and standards to maintain compliance and continually improve our health and safety performance. Through proactive measures and ongoing vigilance, we strive to uphold the highest standards of health and safety welfare for all employees across our operations. All of our workers, both on-shore and at sea are covered by our health and safety management system.

In 2023, we only had 2 recordable work-related accidents across the company which resulted in 63 days of lost work. We aim to have 0 recordable incidents and we will take on learnings from these accidents to improve our safety records in the future. Reported statistics are relate to shore-based employees.

Training

In 2023, we made significant improvements in our health and safety strategy with a larger focus on performance management, enhancing leadership capabilities, career development, and upskilling our teams to align with our sustainability objectives. We prioritise regular training and education on safety procedures and practices to ensure that our workforce is well-equipped to identify and mitigate risks effectively.

Our goal is to create a fulfilling work environment for all our seafarers while continually enhancing their skills and capabilities. To maintain a high level of performance, we provide ongoing training and development opportunities through our advanced training programs. These programs equip our crew with the necessary tools and knowledge to excel in their careers, ensuring that we have the talent pipeline needed to drive our business strategy forward.

We provide a wide range of opportunities for all staff to undertake personal and professional development, which enhances employees' capacity to contribute effectively to strategic and operational plans and objectives, while also encouraging individual development and improving personal effectiveness and satisfaction.

By investing in our employees' development, we build a skilled, motivated, and well-prepared workforce. Our commitment to continued improvement and professional growth underscores our dedication to both our people and our business success.

We are developing systems to track and report on the hours of training provided to each employee and crew member.

Diversity

At UECC, we view diversity and inclusion as a core value and are committed to promoting these principles within our workforce. We believe that embracing diversity not only fosters a culture of inclusivity but also enriches our talent pool by bringing together a wide array of expertise, ideas, and experiences. This is of particular focus for our pool of seafarers, by encouraging more females to take-up seafaring as a profession we can increase the size of our pool ensuring we are able to operate our vessels in a time where there is a shortage of seafarers.

Our goal is to achieve genuine representation of all segments of society, ensuring that every employee feels valued, respected, and empowered to perform at their best. We do not discriminate against gender, ethnicity, socio-economic background, age, disability or any other characteristics.

33% of our management roles are filled by women.

We have representation of all age groups in our workforce:

- Less than 30 years old: 13%
- Between 30-50 years old: 52%
- Above 50 years old: 35%

Engagement across the workforce

Our approach to employee engagement is focussed on cultivating a culture of inclusivity, collaboration, and continuous improvement. We prioritise open and transparent channels of communication throughout the organisation, ensuring that our colleagues feel engaged and empowered to contribute to their best ability. Our goal is to create a motivational and engaging workplace that inspires creativity, innovation and excellence.

Working conditions

Ensuring safe working conditions is a top priority at UECC. We are dedicated to providing a work environment that is not only safe but also conducive to the well-being of all employees. Our comprehensive safety protocols are designed to prevent accidents and injuries and include regular safety audits, risk assessments, and adherence to industry best practices.

UECC maintains a zero-tolerance policy towards harassment and discrimination. Our policies and practices are continuously reviewed and updated to uphold these commitments, ensuring a supportive and equitable work environment. During 2023 there were no reported incidents of discrimination or harassment. There were no reported incidents or fines related to other forms of social or human rights matters.

In addition to safety, we are equally committed to paying our personnel a fair and adequate wages. We comply with all applicable regulations and benchmarks regarding fair and adequate wages.

Workers in the value chain

Our commitment to health, safety, and well-being extends beyond our own workforce to encompass all workers within our value chain.

Recognising the vital role these workers play, we adhere to the standards set by the Norwegian Transparency Act. This legislation guides our efforts to ensure transparency and accountability in our operations, requiring us to disclose information about our practices and their impact on workers throughout the supply chain.

By complying with the Norwegian Transparency Act, we ensure that all our partners and suppliers uphold rigorous health and safety standards. Through regular audits and capacity building, we support our value chain in maintaining high standards of worker welfare.





GOVERNANCE

Governance is the framework of rules, practices, and processes by which our organisation is directed and controlled. It encompasses the mechanisms through which we achieve our objectives, manage risks, and ensure compliance with legal and ethical standards.

Effective governance fosters transparency, accountability, and integrity within an organisation, ensuring that decisions are made in the best interests of all stakeholders. It involves a comprehensive approach to leadership, decision-making, and oversight, incorporating elements such as corporate policies, regulatory compliance, internal controls, and stakeholder engagement.

At its core, good governance is about fostering a culture of responsibility and ethical conduct, which is essential for sustainable growth, trust, and long-term success.

Highlights

- 0 calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index
- 0 confirmed incidents of corruption or bribery
- Enhanced human rights and working conditions due diligence procedures
- ESG-related risk management overseen by executive management



Governance strategy

Our governance strategy is grounded in transparency, and accountability. We recognise that robust governance is essential for navigating the complexities of the global shipping industry, which faces dynamic trade flows, stringent environmental regulations, and evolving customer expectations.

To achieve our goals, we focus on three main pillars:

- **Strategic Decision-Making:** We utilise data analytics to inform decisions about fleet composition, deployment, and cost optimisation. This enables us to improve operational efficiency, reduce environmental impact, and ensure our fleet is well-positioned to meet future demands.
- **Risk Management and Compliance:** Our governance includes rigorous internal controls and regular audits to ensure compliance with both regulatory requirements and our internal standards. We have adopted digital tools to monitor performance and manage risks proactively, ensuring that all aspects of our operations adhere to the highest standards of safety and integrity.
- **Stakeholder Engagement:** We maintain open lines of communication with all stakeholders, including shareholders, employees, customers, and the communities we operate in. This engagement helps us understand and address their concerns, fostering a culture of transparency and mutual respect. We also collaborate with ports and other partners to enhance sustainability initiatives, such as reducing emissions and improving waste management practices.

Our governance structure

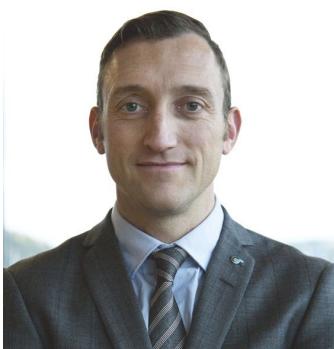
Our board of directors:



Glenn Edvardsen – *CEO*



Thomas Thue – *CFO*



Per Christian Mørk – *COO*



Karin Ellefsen – *CHRO*

ESG oversight

At UECC, we have established robust governance processes to assess and manage sustainability matters effectively. Responsibilities for sustainability-related risks and opportunities are initially managed at the executive management level before being delegated to the appropriate teams. At the C-Suite level the CEO, CFO and COO are responsible for oversight of sustainability related matters. Management report to the board on matters relating to sustainability on a frequent basis.

To ensure that management have the appropriate skills and competencies to deliver effective management of sustainability matters they attend training courses, both external and in-house, and are encouraged to visit seminars and conferences to holistically improve their knowledge base.

Sustainability-related risks and opportunities are evaluated at the departmental level before being presented to the board for consideration. Throughout this process we use controls and procedures for oversight in line with other C-level oversight functions to ensure integration with internal operations.

In 2024 we aim to enhance and formalise our ESG governance structures in preparation for the CSRD.

Our corporate governance approach

At UECC we believe that mutually transparent and relationships with our customers, suppliers and financial partners is essential to our continued success. Through implementation of robust governance policies and internal controls we are able to minimise and manage ESG risks and ensure we are in line with all environmental, social and governance requirements. Through effective reporting we can build strong relationships with our stakeholders based on trust.

In the current climate of increasingly strict regulation, we recognise the need for continual improvement. We continually review our governance structures and procedures to ensure we that are able to maintain our leading environmental and social position and adapt to any and all challenges we face.

At UECC we aim to deliver a high-quality service to our clients, we have established quality management systems to enable us to do this. Our quality management systems are aligned with ISO9001:2000 and ISO14001 standards the International Safety Management System (ISM Code) and the International Ship and Port Facility Security Code (ISPS Code). All of the standards we adhere to are approved by the Lloyd's Register of Shipping and certified by Lloyd's Quality Assurance.

UECC does not tolerate corruption or bribery. In 2023 we continued to have zero reported incidents of corruption or bribery. As a demonstration of our commitment maintain our record of zero incidents all employees must complete anti-bribery and anti-corruption training. We and all of our colleagues comply with anti-corruption and bribery laws in all countries that we operate. These include the anti-bribery legislation enacted by each signatory country in

accordance with the Organisation for Economic Co-Operation and Development Convention on Combatting Bribery of Foreign Public Officials in international Business Transactions (the “OECD Conventions”).

Our conflicts of interest policy requires that our employees have a responsibility to identify and address and conflict of interest that may arise during their work. Employees are required to communicate to their managers any actual or potential conflicts of interest or any sensitive situations that arise.

UECC is fully compliant with all relevant Economic and Trade Sanctions and Regulations in the countries where we operate. We adhere to all export controls, trade restrictions, embargoes and legal economic sanctions that limit activities with specific countries, entities or individuals around the world.

We issue directives that specify which activities are permitted and prohibited in order to ensure compliance with laws aimed at combating anti-competitive behaviour and consumer protections. We provide trainings to all employees on anti-trust laws and customer protections. When we hold meeting with our direct competitors an agenda must be prepared and reviewed in advance in compliance with anti-trust laws. Minutes of the meetings are documented and distributed to our Legal Department.

We are obligated to comply with applicable Data Security and Protection laws in the countries we operate. We safeguard data privacy by ensuring data is securely stored physically and electronically. UECC has a security and data breach response process in place to ensure a swift and effective response in the case of a potential data breach.





ESG and our business partners

The introduction of the Norwegian Transparency Act (“the Act”) brings an important and significant change in the way companies must conduct business. The act requires an increase in the level of due diligence we must conduct through our supply chain and how we report this.

We have always strived to work with partners who share our ambitions, goals and ethics, and the formality this piece of regulation provides is welcome.

The Act requires companies to take steps to identify, address, prevent and limit human rights infringements in their supply chain.

The following pages outline our due diligence process, including a general description of the organisational and activities, our current guidelines and procedures, information regarding any identified adverse impacts and significant risks identified, and any measures or plans implemented to mitigate or address these risks.

1. General overview:

United European Car Carriers (UECC) is a leading provider of high quality and sustainable short sea transportation services for cars and other rolling cargo on the European continent.

UECC was founded in 1990 and is jointly owned by Nippon Yusen Kabushiki Kaisha (NYK) and Wallenius Lines. Our head office is located in Oslo, Norway. In addition, we operate five offices and have an agent network across the European Continent, as well as operating two terminals in Spain.

We operate a fleet that varies in size to match our customers’ needs, typically around 13 pure car and truck carriers (PCTC) that are designed to meet the necessary flexibility and efficiency requirements of the short sea market.

We provide safe and secure short sea transportation of factory new cars and light commercial vehicles. We also offer transportation of a wide range of high and heavy and static cargo.

UECC is committed to integrating ESG principles, including supply chain due diligence, into our operating philosophy.

We promote and adhere to an ESG Policy which describes our firm-wide approach to integrating ESG principles in our business activities. This specifically outlines our engagements and relationships with third parties such as suppliers and other key stakeholders. This Policy complements the UECC Code of Conduct and UECC Third Party Code of Conduct, which further outlines UECC’s expectations of suppliers.

UECC is committed to integrating ESG factors throughout its own operations, taking a risk-based approach to ensure any identified material risks are identified, assessed, and managed appropriately.

The principles and ethos of UECC are regularly communicated throughout the organisation to assist us in continuing to deliver a world-class service with utmost integrity and respect for people and the environment.

2. (a) Guidelines and (b) procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions:

a. Guidelines:

In accordance with the Norwegian Transparency Act, the OECD Guidelines for Multinational Enterprises (OECD Due Diligence Guidance for Responsible Business Conduct) are used to reference our supplier code of conduct, guidelines, and procedures.

These guidelines have been built into our “Third-Party Code of Conduct (CoC)” policies while new procedures have been developed to be compliant with the Act.

This has resulted in an enhanced and holistic framework which embeds responsible business conduct into policies and management systems. These policies and management systems are regularly reviewed.

Our Third-Party Code of Conduct (CoC) and ESG policies are available on our website: <https://uecc.com/customer-supplier-centre/corporate-governance/>

b. Procedures:

(i) Supplier Onboard Procedure:

Third Parties must agree to maintain the standards of our Code of Conduct within their businesses to be engaged by UECC.

The Code of Conduct is presented to all UECC’s Third Party providers. This Code sets out UECC’s compliance standards with respect to business conduct. Where local standards require more stringent controls, local policies must be implemented and followed. In all cases, applicable local laws must always be adhered to.

UECC expects Third Parties to have processes and controls in place to comply with the Code. Where appropriate, we will undertake risk based due diligence as part of monitoring its active relationship with Third Parties.

This includes those with whom UECC propose to engage in a new business relationship. We expect Third Parties to provide complete and accurate information to facilitate UECC’s due diligence policies. If UECC determines that a Third Party has breached the Code, it may require the Third Party to implement a remediation plan or, in certain circumstances, it may suspend or terminate the relationship with the Third Party.

(ii) Existing Supplier Review Procedure:

In accordance with the Act, we undertake an annual risk-based review of all suppliers.

Our risk-based due diligence, as recommended by the OECD Due Diligence Guidance’ is structured around the following steps. When appropriate, third-party contractors are engaged to assist and to act as independent auditors of our engagements.

1. A desk-based due diligence assessment is initially used to identify, assess, and prioritise any actual or potential adverse impacts on fundamental human rights and decent working conditions that we caused or contributed toward, or that are directly linked with our operations via the supply chain or business partners.

The process follows a matrix-based risk-framework, which considers key risk indicators including, but not limited to, spend value, supplier location, the type of goods or services purchased, and recorded history of human rights incidents.

The risk associated with supplier location is informed a number of internationally recognised standards and research institutes:

- a. The continually updated list of Conflict-Affected and High-risk Areas (CAHRAs) (as defined under European Union Regulation 2017/821) and understood in the broader context of the European Commission’s work on trade in general;
- b. The Database on Worldwide Governance Indicators issued by the World Bank,
- c. The Corruption Perception Index from Transparency international
- d. The annually produced list of Human Rights from the United Nations Security Council Resolutions (UNSC).
- e. The Financial Action Take Force (FATF) who identify countries with weak measures to combat money laundering and terrorist financing.
- f. EU’s list of high-risk third countries having strategic deficiencies in their regime on anti-money laundering and countering the financing of terrorism.

This follows recommendations within the non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks under Regulation (EU) 2017/821 of the European Parliament as well as the founding principles of the United Nations’ Guiding Principles on Business and Human Rights.

Any actual or potential adverse impacts on human rights identified are then assessed and prioritised.

2. Enhanced Due Diligence Process and Further Supplier Engagement

Following the identification, assessment, and prioritisation of actual or potential impacts on human rights, suppliers are requested to provide supporting evidence or clarifications to any misalignment with our CoC or concerns raised by UECC.

3. Site Visits

Should a supplier visit be deemed necessary, qualified personnel are deployed to perform site-level audits.

An independent assessment of the supplier is presented to management.

(iii) (a) Actual and (b) potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed toward, or that are directly linked with the enterprise’s operations, products or services via the supply chain or business partners:

- a. A full desk-based audit, as outlined in point 2b (ii), has been performed by an independent third-party consultancy. From this audit there has been no identified actual adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed toward, or that are directly linked with the enterprise’s operations, products or services via the supply chain or business partners.
- b. Potential adverse impacts identified:
 - (i.) One stevedore supplier, one port agent and one HH&BreakBulk are located in Turkey.
 - 1. Turkey is considered by Transparency International as an at-risk country for Corruption: it scores 34/100 (the 0 being the most corrupt; or reference, Norway is scored 84).
 - 2. Turkey appears on the Financial Action Task Force (FATF) Grey List as a country with weak measures to combat money laundering and terrorist financing.
 - 3. We consider Turkey as at-risk from The World Bank’s rating on below indicators, including respective score comparison with Norway:

	Turkey	Norway
Control of Corruption: Estimate	-0.47	2.07
Government Effectiveness: Estimate	-0.20	1.94
Political Stability and Absence of Violence/Terrorism: Estimate	-1.04	0.86
Regulatory Quality: Estimate	-0.25	1.52
Rule of Law: Estimate	-0.46	1.76
Voice and Accountability: Estimate	-0.93	1.77

The desk-based audit returned no specific incidents of negative impacts on human rights or decent working conditions. Following our procedure, all suppliers will be engaged with our enhanced due-diligence process.



(iv) Measures to cease, prevent or mitigate adverse impacts based on the enterprise's prioritisations and assessments pursuant to (iii):

Identified suppliers for potential risk or impacts have been escalated to enhanced due diligence as described in 2 b (ii) 2.

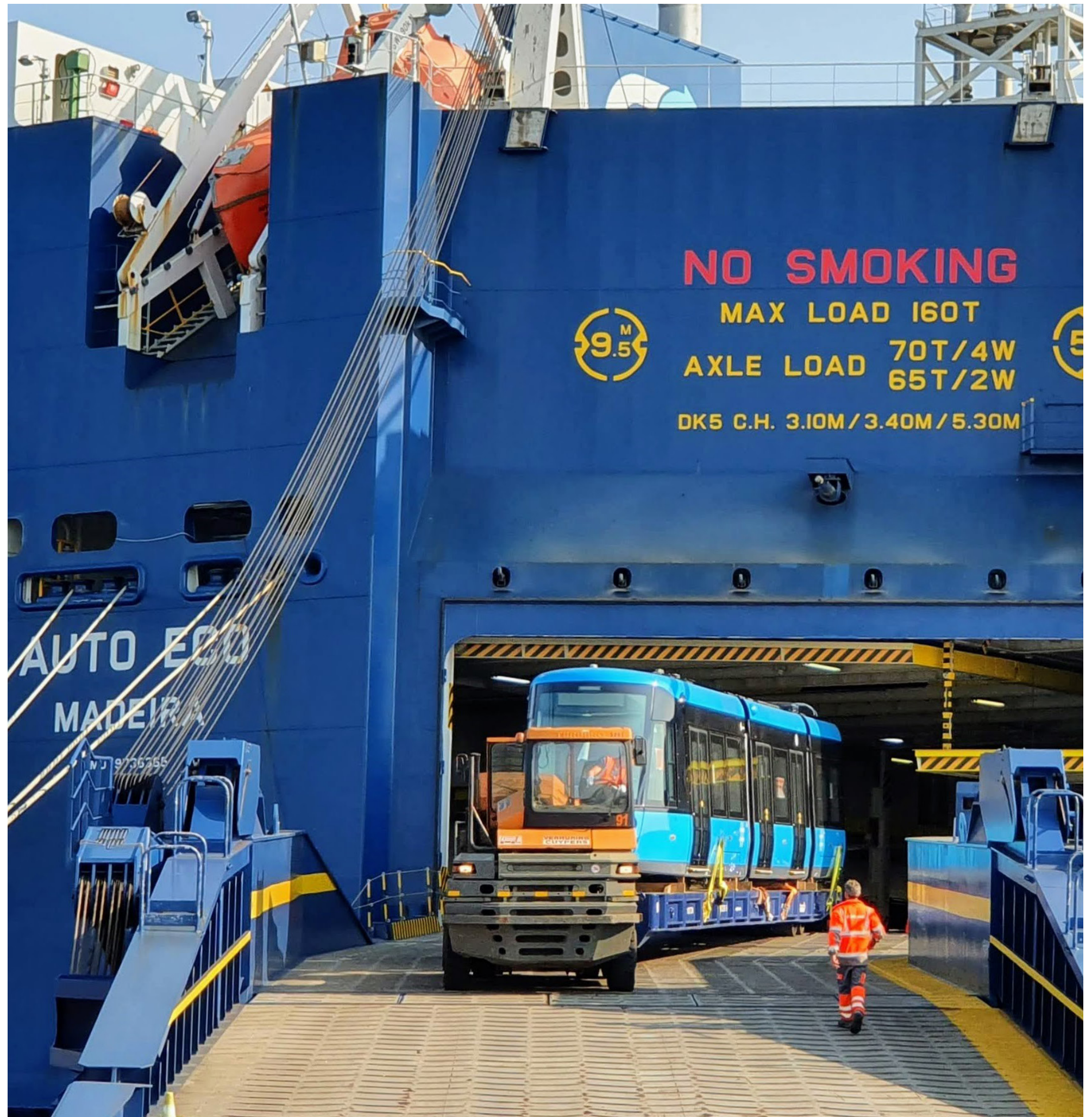
- a. Three suppliers were identified in 2 b (ii) 2 as having potential risk or impact. Documentation was requested to demonstrate the protections they have implemented to ensure the upholding of fundamental human rights and decent working conditions. The documentation provided included the suppliers' code of conduct and other relevant policies pertaining to human rights and working conditions. Our third-party consultants conducted a thorough review of this documentation, comparing it against our own code of conduct and human rights policies to identify any areas of misalignment or omissions.
- b. Through our comprehensive review, no areas of misalignment or concern were identified in the provided documentation.
- c. In the previous year, we identified two Stevedore suppliers and one Port Agent based in St. Petersburg, Russia, as posing a potential risk. Consequently, due to sanctions placed upon the Russian state, we have terminated any engagements with these suppliers to mitigate any potential adverse impacts.

(v) Tracking the implementation and results of measures pursuant to (iv):

The enhanced due diligence measures described in (iv) have not identified any suppliers with actual or potential adverse impacts on fundamental human rights or decent working conditions, therefore no further measures have been taken.

(vi) Communications with affected stakeholders and rights-holders regarding how adverse impacts are addressed pursuant to (iii) and (iv):

The enhanced due diligence measures described in (iv) have not identified any suppliers with actual or potential adverse impacts on fundamental human rights or decent working conditions, therefore no further communication with affected stakeholders is necessary.





Corporate Governance Policies

Compliance program policy

UECC's Compliance Program policy outlines the procedures and principles guiding investigations into business conduct (including corruption or bribery), ensuring thoroughness, impartiality, and transparency throughout the process. We conduct investigations promptly upon receipt of tips and/or allegations, ensuring independence from undue influence, and approaching each case with objectivity and diligence. UECC has procedures to prevent, detect, and address allegations or incidents of corruption and bribery. Our compliance program includes measures such as a Code of Conduct, whistleblowing mechanisms, training courses, reporting and investigation. These initiatives underscore our commitment to upholding the highest standards of integrity and ethical conduct across our operations.

Investigations into allegations or incidents of misconduct, including corruption and bribery, are overseen by our Chief Legal and Compliance Officer. This role ensures impartiality and independence, despite the officer's simultaneous position within management. The compliance program policy outlines responsibilities for reporting findings and outcomes from compliance investigations to relevant bodies, ensuring prompt and accurate communication

Sustainability policy

Policies on sustainability matters are covered across our Supplier Sustainability Policy, Environmental Policy, and Biofuel Sourcing Policy.

The Supplier Sustainability Policy relates to ensuring that UECC's contracted suppliers are in adherence to our own sustainability requirements documented in our Environmental Policy and Biofuels Policy.

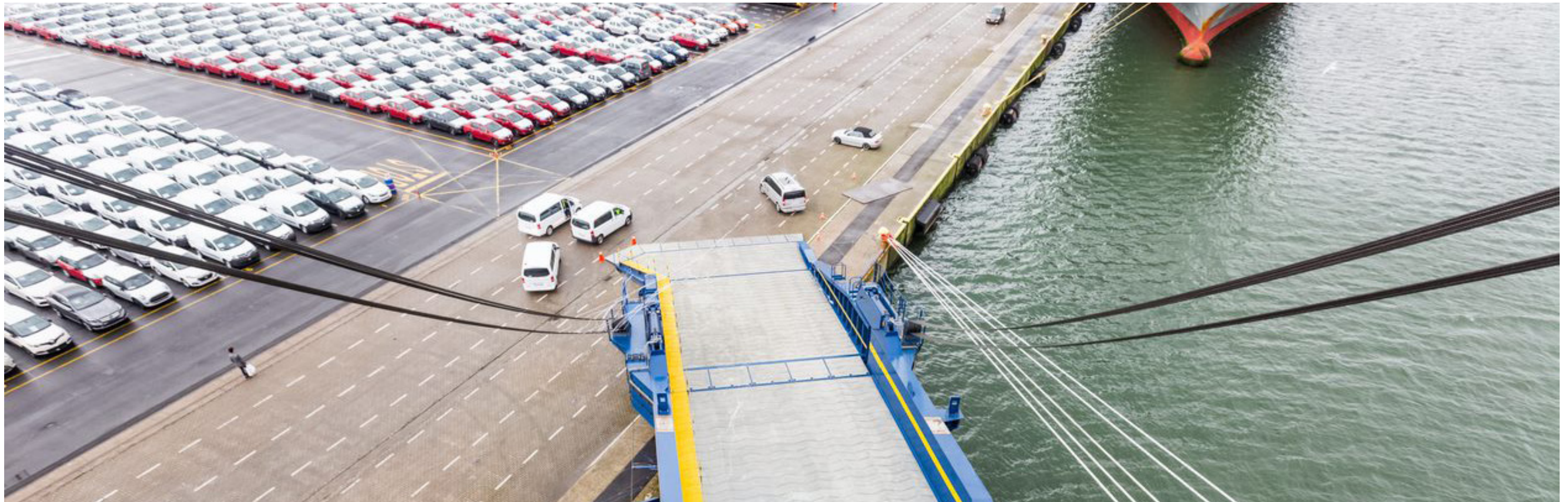
Specifically, the biofuel sourcing policy relates to the company's desire to increase the use of low carbon biofuels. Addressed in the policy are criteria for ensuring the long-term viability of the feedstocks used in the fuel, including but not limited to biodiversity loss, competition with food, and deforestation. This is a program which is not driven by regulatory requirements but by an ambition to create and market more sustainable shipping services.

Code of conduct

Our Code of Conduct serves as a comprehensive framework for all our organisational policies, including anti-bribery, third-party conduct, and conflict of interest policies. By signing off on the Code of Conduct, employees acknowledge their understanding and acceptance of these policies. To identify functions most sensitive to corruption or bribery, we maintain a thorough approach, considering factors such as the nature of duties, interactions with external parties, and access to sensitive information. Based on these considerations, we tailor our training and awareness programs to address specific risks associated with each function.

Whistleblowing policy

UECC is committed to creating an open and transparent environment, with safeguards to encourage the reporting of irregularities and protect whistleblowers. Our whistleblowing policy ensures confidentiality and non-retaliation for employees who report unethical behaviour or refuse to engage in it, even if it may result in potential business loss. We urge our workforce to speak up about any concerns knowing their rights and protections are fully upheld.



Open reporting

Employees can report any concerns they have through our whistleblower reporting system accessible through our internal intranet. This system allows employees to report anonymously, ensuring confidentiality and protection from any potential retaliation. All reports are promptly investigated by our designated team following a strict protocol.

Onboard our vessels we also have an ‘Onboard Complaints Handling Procedure’ which is derived from the MLC certification onboard. This procedure clearly outlines whom individuals can contact to raise any issues, whether personal or company-related, with mandatory responses within specified periods while maintaining confidentiality. Employees can contact the Master, DPA, or external bodies such as the Union, Classification Society, PSC, or Flag to raise concerns, with mandatory responses required within set periods while maintaining confidentiality. We also follow a ‘Code of Conduct for the Merchant Navy’ and a ‘Bullying and Harassment Procedure,’ both of which may escalate to the Complaints Procedure.

Anti-corruption and bribery

UECC has a zero tolerance of bribery and corruption. We offer comprehensive training programs to equip our employees with the knowledge and skills necessary to identify and mitigate corruption and bribery risks. These programs are conducted through in-person meetings and our digital learning platform. Approximately 80-90% of functions-at-risk are covered by these training programs, ensuring that our workforce receives tailored guidance to effectively address corruption and bribery risks. Investigations into allegations or incidents of misconduct, including corruption and bribery, are overseen by our Chief Legal and Compliance Officer.

Third-party code of conduct

Our comprehensive vendor contracting procedure ensures all contracts reference our Third-Party Code of Conduct and include a clause for the right to audit. This procedure outlines methods for determining, documenting, and inspecting vendors for compliance with company policies and purchasing requirements. We assess vendors based on various criteria, including their commitment to environmental and sustainability standards, and expect all our suppliers to adhere to our Third-Party Code of Conduct.

Our commitment extends to supporting vulnerable suppliers and enhancing their social and environmental performance. We continually explore innovative ways to strengthen partnerships and drive positive impacts throughout our supply chain. By implementing these measures, we aim to mitigate supply chain risks and uphold our commitment to sustainability across our procurement processes. UECC prioritises social and environmental criteria when selecting supply-side partners, ensuring alignment with human rights principles and environmental standards, such as those outlined in the International Bill of Human Rights and the ILO’s Declaration on Fundamental Principles and Rights at Work. We require full compliance from all third parties with these regulations.

Supplier policy

There is a policy in place with regards to payments to suppliers. The practice is that payments for every supplier group is done once a week, and all approved invoices that are due is paid. Not approved/disputed invoices that are due will be included in next payment batch after approval.

The Days Payable outstanding (DPO) is monitored monthly and reported in the Monthly management report. UECC aims as a standard to achieve 60 days credit terms with its main suppliers, in the case of bunker and fuel suppliers the payment terms are typically 14 days.

Communication of corporate governance policies

Policies are communicated to relevant individuals within our organisation through various channels. This includes information via our Code of Conduct, which requires signing as an acknowledgment of understanding and compliance. Additionally, training sessions provide employees with comprehensive insights into policy updates and implications. Policies are readily available and accessible to employees through our internal platforms.

UECC utilise a digital learning platform for conducting various training courses, including those related to business conduct and ethics. It’s imperative for all employees to complete these training modules and subsequently sign off, demonstrating their commitment to adhering to our Code of Conduct.

Our business conduct training is provided to all employees across the organisation. Training sessions are conducted periodically to ensure regular reinforcement of ethical principles and compliance standards. The frequency and depth of coverage vary based on the specific needs of different departments and roles within the organisation.

SASB Metrics

Topic	Metric	Unit	Response
TR-MT-000.A	Operations	Number of shipboard employees	295
TR-MT-000.B		Total Distance (nautical miles) travelled by vessels	1,048,000
TR-MT-000.C		Total Operating Days	4,730
TR-MT-000.D/G		Total Vessel DWT/TEU	RT43 39,050
TR-MT-000.D/G		Average DWT/TEU capacity	RT43 3,004
TR-MT-000.E		Number of vessels in total shipping fleet	Number 13
TR-MT-000.F		Number of vessel port calls	Number 1,742
TR-MT-110a.1 ESRS E1-6	GHG emissions	Gross global Scope 1 emissions	Metric tons (t) CO ₂ -e 232,120
TR-MT-110a.2		Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	n/a See Our Climate Strategy page 11.
TR-MT-110a.3		Heavy fuel oil consumed (ASTM Specifications D 396 and D 975 and Federal Specification VV-F-815C)	Metric tonnes (t) 0
TR-MT-110a.3 ESRS E1-5	Energy use and mix	(1) Total Energy consumed	Gigajoules (GJ) 3,700,000
		(2) Percentage heavy fuel oil	Percentage (%) 27
		(3) Percentage renewable	Percentage (%) 14
TR-MT-110a.4		Average Energy Efficiency Design Index (EEDI) for new ships	Grams of CO ₂ per ton-nautical mile 14.83
TR-MT-120a.1 ESRS E2-4	Air pollution	(1) NO _x (excluding N ₂ O)	Metric tons 4,750
		(2) SO _x	Metric tons 1,300
		(3) particulate matter (PM ₁₀)	Metric tons 220
TR-MT-160a.1	Ecological Impacts	Shipping duration in marine protected areas or areas of protected conservation status	Number of travel days 0
TR-MT-160a.2 ESRS E2-5 ESRS E5-5	Water pollution	Percentage of fleet implementing ballast water exchange / treatment	Percentage (%) 100%
TR-MT-160a.3 ESRS E2-4		(1) Number of spills and releases to the environment	Number 0
		(2) aggregate volume of spills and releases to the environment	Cubic meters (m ³) 0
TR-MT-540a.1	Accident & Safety Management	(1) Number of marine casualties	Number NIL
		(2) Percentage classified as very serious	Percentage (%) NIL
		Number of Conditions of Class or Recommendations	Number 6
TR-MT-320a.1 ESRS S1-14	Health and safety indicators:	(a) the percentage of own workers who are covered by the undertaking’s health and safety management system based on legal requirements and/or recognised standards or guidelines;	Percentage (%) 100%
		(b) the number of fatalities as a result of work-related injuries and work-related ill health;	Number 0
		(c) the number and rate of recordable work-related accidents;	Number 2
		(d) the number of cases of recordable work-related ill health; and	Number 0
		(e) the number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health.	Number 63
TR-MT-510a.1	Business Ethics	Number of calls at ports in countries that have the 20 lowest rankings in Transparency International’s Corruption Perception Index	n/a 0

Additional Metrics

	Topic	Metric	Unit	Response
Common Disclosure	Energy use and mix	Number of countries in which the company maintains offices	Number	5 (Norway, Spain, Portugal, UK, Belgium)
Common Disclosure		Average age of vessels	Number	15 years full fleet / 12 years owned part of fleet
Common Disclosure		Number of vessels on order	Number	0
Common Disclosure		Number of Vessels by Flag State	Number	9 Madeira (Portugal), 3 Bahamas, 1 Panama
Common Disclosure		Total vessels on order DWT	Number	0
Additional disclosure		Annual Efficiency Ratio (AER)	gCO ₂ /(MT-nm)	5.85
Additional disclosure		Energy Efficiency Operational Indicator (EEOI)	gCO ₂ /tonne mile	88.43
ESRS E2-5	Substances of concern and substances of very high concern	Amounts of substances of concern that are generated or used during the production or that are procured, and that leave its facilities as emissions, as products, or as part of products or services split into main hazard classes of substances of concern.	Type and amount	Nil
		Sludge	Cubic meters (m³)	2,243
		Bildge	Cubic meters (m³)	339
ESRS3-4	Water consumption	(a) total water consumption in m³;	Cubic meters (m³)	10,602
		(b) total water consumption in m³ in areas at material water risk, including areas of high-water stress;	Cubic meters (m³)	0
		(c) any contextual information necessary regarding the local basins’ water quality and quantity, how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modelled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.	n/a	Water consumption has been calcualted calcaulated based on the amount of fresh water loaded onto the vesssles and produced onboard by evapouration.
		(a) total water recycled and reused in m³;	Cubic meters (m³)	0
		(b) total water stored and changes in storage in m³; and	Cubic meters (m³)	500
		(c) contextual information related to points (a) and (b).	n/a	Estimated total onboard water storage
Additional disclosure ESRS E2-4	Waste	Percentage of fleet using Exhaust Gas Cleaning Systems / Low-Sulphur Fuel Oil	Percentage (%)	0%

Topic	Metric	Unit	Response
ESRS S1-6	Characteristics of the undertaking's employees:	(a) a report by head count of the total number of employees, and breakdowns by gender and by country for countries in which the undertaking has 50 or more employees;	198 Seagoing Employees 84 Shore-based Employees Female 28% and Male 72%
		(b) a report by head count or full time equivalent (FTE) of: i. permanent employees, and breakdowns by gender and by region; ii. temporary employees, and breakdowns by gender and by region; and iii. non-guaranteed hours employees, and breakdowns by gender and by region.	1 internship (male) 1 employee through agency (male) Otherwise permanent contracts in 100% owned entities
		(c) total number and rate of own employee turnover in the reporting period in head count.	10%
		(d) a description of the methodologies and assumptions used to compile the data, including whether the numbers are reported: i. in head count or full-time equivalent (FTE) (including an explanation of how FTE is defined); and ii. at the end of the reporting period, as an average across the reporting period, or using another methodology.	UECC only has FTE's and we use the average number of employees across the year
		(e) where applicable, the provision of contextual information necessary to understand the data (for example, fluctuations in number of employees during the reporting period); and	n/a
ESRS S1-8	Collective bargaining coverage and social dialogue:	(a) the percentage of total employees covered by collective bargaining agreements;	0%
		(d) the global percentage of employees covered at the establishment level by workers' representatives, reported at the country level for each EEA country in which the undertaking has significant employment; and	The only location where we have "significant" employment is Oslo. These employees are covered by the Working Environment Committee (AMU) which has 2 representatives equating to 3.77%
ESRS S1-9	Diversity indicators:	(a) the gender distribution in number and percentage at top management level amongst its employees; and	Male 4 (67%) Female 2 (33%)
		(b) the distribution of employees by age group: under 30 years old, 30-50 years old; over 50 years old	<30: 12 (13%) 30-50: 46 (52%) >50: 31 (35%)
ESRS S1-10	Adequate wages:	1. The undertaking shall disclose whether or not all workers in its own workforce are paid an adequate wage, in line with applicable benchmarks. If so, stating this will be sufficient to fulfil this disclosure requirement and no further information is needed.	Yes, all of our workforce are paid an adequate wage in line with all applicable benchmarks and regulations
ESRS S1-11	Social protection:	Whether or not all workers in its own workforce are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events: (a) sickness; (b) unemployment starting from when the own worker is working for the undertaking; (c) employment injury and acquired disability; (d) maternity leave; and (e) retirement. If so, stating this will be sufficient to fulfil this disclosure requirement and no further information is needed.	Yes, all workers in UECC's workforce are covered by applicable social protections
ESRS S1-12	Persons with disabilities:	a) the percentage of persons with disabilities amongst its employees subject to legal restrictions on the collection of data.	Under Norwegian law we are prohibited in collecting and reporting data regarding disabilities
		b) the percentage of employees with disabilities with a breakdown by gender.	Under Norwegian law we are prohibited in collecting and reporting data regarding disabilities
ESRS S1-13	Training and skills development indicators	(a) the percentage of employees that participated in regular performance and career development reviews; such information shall be broken down by employee category and by gender;	Annual Personal Development Plan is in place for 100% of employees.
ESRS S1-15	Work-life balance indicators:	(a) the percentage of employees entitled to take family-related leaves; and	100%
		(b) the percentage of entitled employees that took family-related leaves, and a breakdown by gender.	n/a - not differentiated

	Topic	Metric	Unit	Response
ESRS S1-16	Compensation indicators (pay gap and total compensation):	(a) the male-female pay gap, defined as the difference between average gross hourly earnings of male paid employees and of female paid employees expressed as a percentage of average gross hourly earnings of male paid employees;	Percentage (%)	77%
		(b) the ratio of the annual total compensation ratio of the highest paid individual to the median annual total compensation for all employees (excluding the highest-paid individual); and	Ratio	1 : 0.32
		(c) where applicable, any contextual information necessary to understand the data and how the data has been compiled and other changes to the underlying data that are to be considered.	n/a	For reference with regards to point a) We have 48% more male employees of which 34% are high earners
ESRS S1-17	Incidents, complaints and severe human rights impacts and incidents:	(a) the total number of incidents of discrimination, including harassment, reported in the reporting period;	Number	0
		(b) for the remaining social and human rights matters (i.e. excluding discrimination or harassment), the number of complaints filed through channels for own workers to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises;	Number	0
		(c) the total amount of material fines, penalties, and compensation for damages as a result of violations regarding social and human rights factors; and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements; and	Currency	0
		(d) where applicable, contextual information necessary to understand the data and how such data has been compiled.	n/a	n/a
ESRS G1-1	Initiatives to establish, develop and promote a corporate culture as well as its policies with respect to business conduct matters.	(a) a description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar documents; and whether it accommodates reporting from internal and/or external stakeholders;	n/a	See Governance section of the report
		(b) if there are no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption, it shall state this and whether it has plans to implement them and the timetable for implementation;	n/a	See Governance section of the report
		(c) safeguards for reporting irregularities including whistleblowing protection, including: i. protection of those of its own workforce who refuse to act unethically even if such refusal may result in loss of business; and ii. non-retaliation against own workers who have been granted whistle-blower status in accordance with the applicable law and own workers who report any non-ethical behaviour incidents;	n/a	See Governance section of the report
		(d) where there are no policies on the protection of whistle-blowers, it shall state this and whether it has plans to implement them and the timetable for implementation;	n/a	See Governance section of the report
		(e) whether there is a commitment to investigate business conduct (including corruption or bribery) incidents promptly, independently and objectively;	n/a	See Governance section of the report
		(g) the strategy for training within the organisation on business conduct, including target audience, frequency and depth of coverage as well as the identification or definition of the functions within the undertaking that are most at risk in respect of corruption/bribery.	n/a	See Governance section of the report
ESRS G1-2	Information about the management of its relationships with its suppliers and its impacts on its supply chain:	1) A description of policies/practices to prevent late payments to SMEs specifically when providing information of its relationships.	n/a	See Governance section of the report
		(a) the undertaking's strategy with respect to its relationships with its suppliers, in the context of the risks of the supply chain specifically and sustainability generally;	n/a	See Governance section of the report
		(b) whether and how it takes into account social and environmental criteria for the selection of its supply-side contractual partners; and	n/a	See Governance section of the report
		(c) description of the undertaking's practices implemented to support vulnerable suppliers and improve their social and environmental performance.	n/a	See Governance section of the report

	Topic	Metric	Unit	Response
ESRS G1-3	Information about its system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training:	(a) an overview of the procedures in place to prevent, detect, and address allegations or incidents of corruption/bribery;	n/a	See Governance section of the report
		(b) whether the investigators or investigating committee are separate from the chain of management involved in the matter; and	n/a	See Governance section of the report
		(c) the process to report outcomes to the administrative, management and supervisory bodies.	n/a	See Governance section of the report
		(d) How policies are communicated to those for whom they are relevant to ensure that the policy is accessible and that they understand its implications.	n/a	See Governance section of the report
		"(e) Include information about the following with respect to training: (i) the nature, scope and depth of anti-corruption/anti-bribery training programmes offered or required by the undertaking; (ii) the percentage of functions-at-risk covered by training programmes; and (iii) where applicable, the information relating to members of the administrative, supervisory and management bodies"	n/a	See Governance section of the report
ESRS G1-4	Confirmed incidents of corruption or bribery:	(a) the total number and nature of confirmed incidents of corruption or bribery;	Number	0
		(b) the number of convictions and the amount of fines for violation of anti-corruption and antibribery laws;	Number	0
		(c) details of public legal cases regarding corruption or bribery brought against the undertaking and its own workers during the reporting period and the outcomes of such cases;	n/a	0
		(d) the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents; and	Number	0
		(e) the number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery.	Number	0
ESRS G1-6	Payment practices:	(a) the average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days;	Number	70 days The Days Payable outstanding (DPO) is monitored monthly and reported in the Monthly management report. Over the last 12 months the average has been around.
		(b) a description of the undertaking's standard payment terms in number of days by main category of suppliers and the percentage of its payments aligned with these standard terms;	n/a	UECC tries as a standard to achieve 60 days credit terms with its main suppliers, but for some supplier groups (i.e fuel) the payment terms can be as low as 14 days.
		(c) the number of legal proceedings (currently outstanding) during the reporting period for late payments; and	Number	0
		(d) complementary information necessary to provide sufficient context.	n/a	n/a



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