

Regulation	Aim & Effective Date	GULFNAV's Response	Fleet Management Response
IMO Ballast Water Management Convention	Sets standards for proper management of ballast water and sediments to prevent the spread of harmful marine species.  Effective Date: 8 Sep 2017.	Installation of advanced ballast water treatment systems in one of our vessels. With the aim to be installed across our entire fleet by 2023.	GULF FANATIR, GULF HUWAYLAT, GULF DEFFI & GULF JALMUDA are planned for the installation of BWTS in next DD. Presently vessel following D-1 method for Ballast water management.
IMO 2020 enhanced global sulphur limit (MARPOL Annex VI, regulation 14)	Enhances existing limits for sulphur content in marine fuel to reduce emissions of sulphur oxides and other pollutants. Effective Date: 1 Jan 2020.	Installation of Exhaust Gas Cleaning Systems (EGCS); evolving fuel strategy including use of Low Sulphur Fuel Oil (LSFO).	Vessels supplied with Low Sulphur Fuel Oil (LSFO) to comply with the global sulphur limit.
IMO Data Collection System (DCS)	Requires collection of fuel consumption data for ships 5,000 GT or over as part of the mandatory Ship Energy Efficiency Management Plan.  Effective Date: 1 Mar 2018 for data collection from 1 Jan 2019.	Initiated advanced data acquisition across fleet.	For GULF FANATIR, GULF HUWAYLAT, GULF DEFFI & GULF JALMUDA data acquisition completed for year 2022 and same submitted to NKK for verification and issuance of compliance certificate.
EU Monitoring, Reporting & Verification (MRV)	Requires collection of CO2 emissions data for ships over 5,000 GT calling at EU/EFTA ports.  Effective Date: 1 Jul 2015 for data collection from 1 Jan 2018.	Initiated advanced data acquisition across fleet	Vessels on TC to trade in Asia region. Moreover, data acquisition is in progress, but so far none of the vessels under our management called European ports, also EU MRV monitoring plan not available for all four vessels.

# CONTINUOUS IMPROVEMENT OF OUR ENVIRONMENTAL PERFORMANCE

We are fully committed to further reducing energy consumption and CO<sub>2</sub> emissions across all our operations. Emissions vary from vessel to vessel and voyage to voyage, for reasons including operational factors, vessel load and waiting times in ports.

To monitor the performance of individual ships and our fleet over time, among other measures, we use the Energy Efficiency Operational Indicator (EEOI) tool, as set out in the IMO Guideline MEPC.1/circ.684. Our EEOI analyses show that we have significantly reduced our carbon dioxide emissions per metric tonne of cargo moved on a per mile basis. To meet forthcoming EEXI compliance we are collaborating with engine builders like Hyundai and MAN ES to retrofit Engine Power Limiting Devices on our vessels as a short term compliance solution and further opting for more greener technologies to upgrade our vessels to meet more stringent IMO future requirements.

As an ISO 9001:2015 certified company accredited by Bureau Veritas, GHN is committed to adhering to the requirements of the international management code for the safe operations of vessels, pollution prevention and environmental control including compliance with all the applicable international laws, regulations and requirements.

CO<sub>2</sub> emission per distance  
(Tons / Nautical mile):

**0.286**

CO<sub>2</sub> emissions per transport work  
(grams / Tons \* Nautical mile):

**15.7225**

GULFNAV's vessels routinely maintain the following Certificates in compliances with MARPOL:

- International Anti-Fouling Certificate
- International Oil Pollution Prevention Certificate
- International Ballast Water Management Certificate
- International Sewage Pollution Prevention Certificate
- International Air Pollution Prevention Certificate
- Sanitation Control Certificate
- Garbage Pollution Prevention Certificate
- Certificate of Compliance for Inventory of Hazardous Materials
- Confirmation of Compliance for DCS

GULFNAV endeavors to demonstrate its commitment to environmental protection and the effectiveness

and the compliance of its Environmental Management System (EMS) with the MARPOL and ISO 14001 standards requirements. Furthermore, we follow the International Safety Management – ISM Code for safe ship operation and pollution prevention.

For this purpose, GULFNAV has established, documented, and implemented an Environment Management System designed to comply with the upmost national and international requirements.