



ATLANTIC NAVIGATION HOLDINGS (SINGAPORE) LIMITED
(Company Registration No. 200411055E)

Sustainability Report 2022

Date of issue: 28 April 2023

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This sustainability report has been reviewed by the Company’s sponsor, SAC Capital Private Limited (the “Sponsor”). This sustainability report has not been examined or approved by the Singapore Exchange Securities Trading Limited (the “SGX-ST”) and the SGX-ST assumes no responsibility for the contents of this sustainability report, including the correctness of any of the statements or opinions made or reports contained in this sustainability report.

The contact person for the Sponsor is Ms Lee Khai Yinn (Telephone number: +65 6232 3210) at 1 Robinson Road, #21-00 AIA Tower, Singapore 048542.



Part

1

Overview

Part 1: Overview

- ❖ *GRI 2: 2 General Disclosures*
- ❖ *GRI 2: 2-1 Organizational details*

1.A. Corporate Profile

Atlantic Navigation Holdings (Singapore) Limited (the “Company” and together with its subsidiaries, the “Atlantic Group” or the “Group”) is listed on the Catalist board (“Catalist”) of the Singapore Exchange Securities Trading Limited (“SGX-ST”).

This report was prepared in accordance with Rules 711A and 711B of Listing Manual Section B: Rules of Catalist (“Catalist Rules”), read with Practice Note 7F Sustainability Reporting Guide of the Catalist Rules.

- ❖ *GRI 2: 2-6 Activities, value chain and other business relationships*

The Atlantic Group’s business activities commenced in 1997 in Dubai, United Arab Emirates (“UAE”) to provide ship repair, fabrication and other marine services to ship owners in the Middle East region. The Atlantic Group has since evolved from a ship repair, fabrication and other marine services provider to a ship owner and integrated offshore service provider.

As an integrated offshore service provider, we currently operate mainly through our subsidiaries, namely Atlantic Maritime Group FZE which is based in Hamriyah Free Zone, Sharjah, as well as Atlantic Ship Management LLC which is based in Abu Dhabi, both based in the UAE.

Listed on the Catalist, the Company changed its name to Atlantic Navigation Holdings (Singapore) Limited on 31 July 2012, following the completion of the reverse acquisition by Fastube Limited.

Our commitment to providing dedicated and reliable services has allowed us to develop strong and lasting relationships with a diverse range of industry-leading organizations. We are proud to have established successful partnerships with leading oil companies, offshore contractors, survey companies, ship owners, shipyards, and ship brokers/charterers in the region.

In addition, we have forged valuable relationships with Middle Eastern National Oil Companies (“MENOCs”), as well as Engineering, Procurement, and Construction (“EPC”) contractors across key markets in Saudi Arabia, UAE, Oman, and Qatar, among other countries. We value these partnerships and remain committed to delivering exceptional service to all of our valued clients.

Our Industry

Primary

- Offshore Marine Oil & Gas Service Provider
- Shipownership & ship management via MLS Division

Secondary

- Ship repair & maintenance of marine vessels via SRM Division

Our Services: (1) Marine Logistics Services (“MLS”)

Our MLS Division provides ship chartering and technical management, principally for the offshore oil and gas as well as marine construction industries, currently operating across the Middle East region.

The division is supported by our owned fleet of 18 vessels (including one vessel under liquidation process) comprising lift-boats (a.k.a. jack-up accommodation barges), a mid-sized DP2 vessel, various AHTs, maintenance utility vessels, as well as a tugboat, crew boat and work utility vessel as at 31 March 2023. The fleet list and the salient features of these vessels were presented on Page 11 of the latest Company’s Annual Report 2022 (“AR2022”).

In addition, we also cross-charter vessels from third parties to service contracts which are secured to serve the specific needs of our customers.

We provide services supporting across the different phases of offshore oil-field development encompassing broadly exploration, construction, production, and post-production.

Below is a list of selected main services offered by the MLS Division:

- Anchor handling operations and towage of vessels including drilling rigs, construction barges etc.
- Supporting offshore diving and seismic survey operations, including Remotely Operated Vehicles (“ROV”)
- Transporting materials and structures for offshore construction and installation
- Assisting pipe-laying, cable-laying, jacket commissioning or decommissioning
- Providing standby duties such as fire-fighting duties and anti-pollution and prevention measures
- Providing supply services for production and maintenance operation
- Providing support for Single Buoy Mooring (“SBM”) operation and maintenance
- Cross chartering and management of third-party vessels to serve the specific needs of our customers

Our Services: (2) Ship Repair, Fabrication and Other Marine Services (“SRM”)

Our SRM Division provides afloat and supports dry-dock repair and maintenance services with the workshop facilities based at our premises at Hamriyah Free Zone, Sharjah, UAE, as well as a light workshop facility in Dubai Maritime City to customers in the shipping and off-shore oil and gas industries as well as to our own-fleet of vessels utilised in our MLS Division.

The types of services provided by SRM are mainly as follows:

- Fabrication, steel and mechanical works, and carpentry
- Electrical and air-condition works
- Blasting and painting
- Tank cleaning

Our Services: (3) Project Work

The Group is currently engaged in project work which utilises more sophisticated vessels (for example, our PSV DP2 vessel, i.e. AOS Neptune in FY2021 and FY2022), in supporting offshore operations including those involving ROV operations and seismic studies where project management work with the end-client and other companies providing the supporting services are required.

We are a marine service provider to MENOCs and oil majors such as Saudi Aramco, Abu Dhabi National Oil Company (“ADNOC”), Qatar Gas and Qatar Petroleum, and independent oil companies such as Masirah Oil, as well as international offshore EPC contractors such as Saipem, McDermott, Subsea 7 and NPCC.

❖ GRI 2: 2-1 Organizational details

Our corporate headquarters is based in Singapore, with the registered office details as follows:

Address: 30 Cecil Street, #19-08, Prudential Tower, Singapore 049712
Tel: +65 6812 1611
Fax: +65 6812 1601

Furthermore, our share registrar’s location is at the following details:

Name: Boardroom Corporate & Advisory Services Pte. Ltd.
Address: 1 Harbourfront Avenue, #14-07, Keppel Bay Tower, Singapore 098632

While we are registered and headquartered in Singapore, our main operations are in the Middle East, principally in the UAE, Saudi Arabia, Oman and Qatar.

The business office addresses of our main subsidiaries are as follows:

- (i) Atlantic Maritime Group FZE (“AMG FZE”)
Address: Plot No. HD-02 P.O. Box 6653, Hamriyah Free Zone, Sharjah, United Arab Emirates
Tel: +971 6 5263577
Fax: +971 6 5260292

- (ii) Atlantic Ship Management LLC (“ASM LLC”)
Address: P.O. Box 37288 Abu Dhabi, Unit 205, Al Salam Street, Al Salam HQ Building, Abu Dhabi, United Arab Emirates
Tel: +971 2 4453838
Fax: +971 2 4453837

❖ *GRI 2: 2-2: Entities included in the organization’s sustainability reporting*

Our ownership and legal form as well as the entities included in the audited consolidated financial statements, being the Company and its subsidiaries, are presented on Page 17 of AR2022. There is no change to the list of entities in FY2022.

❖ *GRI 2: 2-6 Activities, value chain and other business relationships*

The supply chain involves mainly the clients, the operations involving the MLS and SRM operations and the suppliers as summarised on Pages 5 and 6 of this report. There have been no significant changes in supply chain from the last sustainability report.

❖ *GRI 1: Foundation 2021*

Atlantic Navigation Holdings (Singapore) Limited has reported the information cited in the GRI content index for the period from 1 January 2022 to 31 December 2022 (the “reporting period”) with reference to the Global Reporting Initiative (“GRI”) Standards.

This report is also prepared in accordance with the Catalist Rules 711A and 711B. This is to be read with Practice Note 7F Sustainability Reporting Guide of the Catalist Rules. The Group had also provided disclosures with reference to the Task Force on Climate-Related Financial Disclosures (“TCFD”) recommendations.

Atlantic Group was also committed and in compliance with several global industry standards and codes, such as IMO, SOLAS, MARPOL.

1.B. Board Statement

- ❖ *GRI 2: 2-22 Statement on sustainable development strategy*
- ❖ *GRI 2: 2-14 Role of the highest governance body in sustainability reporting*

The Board of Directors (the “Board” or the “Directors”) is cognisant of its responsibilities and the important role in setting strategic objectives for the Company including an appropriate focus on sustainability endeavours of the Group. The Board has determined that sustainable business practices are principal factors of the long-term viability of the Atlantic Group. As such, the Board has closely interacted with the Senior Management (as defined below) to ensure that sustainability governance is appropriately structured and functioning through the various levels of management. The Board is committed to continually assessing and determining the material sustainability issues for the Company and overseeing the management and monitoring of the material environmental, social, and governance (“ESG”) factors.

The operations of the Atlantic Group are managed by the senior management team that currently consist of the Chief Executive Officer (“CEO”) who is also an Executive Director of the Company, the Deputy CEO who is also the Chief Operation Officer (“COO”), Chief Financial Officer (“CFO”), the Project Director of Shipyard Operations as well as the Operations Manager (collectively, known as the “Senior Management”). While focusing on the operational and financial performance of the Atlantic Group, the Board and the Senior Management are actively engaged in the governance of sustainability issues through the material ESG factors as identified being critical to the Atlantic Group's business and strategy. In addition, the Senior Management is responsible for ensuring that ESG factors are monitored on an ongoing basis and properly managed and is of the view that the sustainability report provides a transparent presentation of its sustainability performance and demonstrates the Group's ongoing commitment to sustainability. The material ESG factors are determined, managed, and monitored by the cooperation between the Board and the Senior Management.

The interaction between the Board with the Senior Management has enabled the Board to satisfy itself with the way sustainability reporting is structured and functioning through the various levels of management. As a result, the Board, together with the Senior Management, believes that this sustainability report provides a reasonable and transparent presentation of the Atlantic Group's sustainability performance. In this respect, we collectively affirm that our sustainability reporting is in compliance with Rules 711A and 711B of the Catalist Rules. The Report presents the Group's ESG initiatives, plans, and performances, demonstrates the Group's ongoing commitment to sustainability, and serves as a platform to communicate with its stakeholders.

This statement also conforms with the revised Code of Corporate Governance issued on 6 August 2018 (the “2018 Code”) and its Practice Guidance, specifically, Principle 1 of the 2018 Code, which states that the Board is collectively responsible for the long-term success of the Company. In line with Principal 1 and Practice Guidance 1 of the 2018 Code, the Directors affirm that the Board has fulfilled its role in considering and determining the material sustainability issues throughout this report and has considered and will continue to consider and further assess ESG factors on an ongoing basis in formulation of the Group's strategies.

1.C. Ethics & Integrity

❖ *GRI 2: 2-23 Policy commitments*

The handbook on the Code of Conduct of the Company (the “Code”) sets out the standards of behavior expected all of the employees of the Atlantic Group who are to comply with all existing and applicable laws and regulations in locations where they operate including, but not limited to, compliance to laws relating to fraud, corruption, bribery and all criminal offenses as well as all policies related to Health, Safety and Environment (“HSE”) as per the respective manuals of the Atlantic Group. We aim to achieve the highest levels of corporate ethics and transparency through sound corporate governance and appropriate internal controls.

The Group has a whistleblowing policy whereby employees may report possible improprieties and breach laws, regulations, public policies and Atlantic Group’s policies as per the Code. All whistleblowers could call and/or email to the Executive Director and CEO or the Chairman of the Audit Committee (“AC”), as the case may be, directly and in confidence, and his/her identity is kept confidential and he/she is protected from reprisals within the limit of the law. The recipient of the whistleblowing report shall maintain a record of all complaints received together with the actions taken and shall present such record to the AC at the AC meetings.

There have been no known incidents of corruption, bribery and criminal offences in the Atlantic Group during the reporting period. The Atlantic Group will continue to maintain the whistleblowing policy and other internal controls in place to prevent wrongful acts.

1.D. Governance

The Board of Atlantic Navigation Holdings (Singapore) Limited is committed to maintaining a high standard of corporate governance within the Company and the Atlantic Group to safeguard the interests of shareholders and to enhance corporate value and accountability.

The 2018 Code was issued with the aim to enhance board quality by strengthening board independence and diversity and encourage better engagement between companies and all stakeholders. The 2018 Code is effective for annual reports covering financial years commencing from 1 January 2019.

The Company has allocated the responsibility of implementing its policy commitments for responsible business conduct to different levels within the organization. The highest governance body is responsible for oversight of the implementation of these commitments, while senior executives are accountable for their implementation at the operational level. The Company's human resources department is responsible for implementing the commitment to respect the rights of workers. Responsible business conduct is discussed at meetings of the highest governance body and senior executives, and a cross-functional working group is established for discussions about responsible business conduct between different levels or functions in the organization.

The Company has integrated its policy commitments into its organizational strategies, operational policies, and operational procedures. Its sustainability strategy reflects its commitment to responsible business conduct, and the Company has updated its policies and procedures to reflect this commitment. Responsible business conduct considerations are also integrated into the Company's risk management systems and management policies, economic, environmental, social, and human rights impact assessments, and other due diligence processes.

The Company implements its policy commitments with and through its business relationships. It applies its policy commitments when making decisions, such as about its sourcing and operating locations. The Company has procurement and investment policies and practices that align with its policy commitments, and it engages with whom it has business relationships to ensure that they also align with these commitments. The Company applies pre-qualification processes, bidding criteria, and screening criteria consistent with the expectations stipulated in its policy commitments for responsible business conduct, and it considers these commitments in contracting or investment agreements and in specific policies or codes of conduct for suppliers.

The Company provides training on how to implement its policy commitments in general and in specific situations. For example, it ensures that its employees are trained to respect the privacy of its customers' personal data and that its policy commitments are considered in procurement practices. The Company also provides training to those with day-to-day responsibility for implementing each of its policy commitments. The Company uses internal audit and other systems to monitor compliance with its policy commitments throughout its activities (across functions and geographic locations) and throughout its business relationships. Reporting lines to senior decision-making levels are established for functions in the organization with day-to-day responsibility for implementing each of its policy commitments, and policies and procedures are put in place that set financial and other performance incentives for management or workers.

The Company has established mechanisms for individuals to seek advice on implementing the organization's policies and practices for responsible business conduct and to raise concerns about the organization's business conduct. These mechanisms include confidential interviews during site visits, escalation processes, hotlines, and whistleblowing mechanisms. The intended users of these mechanisms are all employees, The Company will look into extending it to other stakeholders who interact with the Company in the future. The mechanisms operate at different levels and functions within the organization, and each has an assigned responsibility for the mechanisms which are operated independently of the organization, by a third-party service provider.

The process through which concerns are investigated includes an initial assessment of the issue raised, followed by an investigation, and finally, a determination of whether the issue is substantiated or unsubstantiated. Requests for advice and concerns raised are treated confidentially, and individuals can use the mechanisms anonymously. The Company ensures that intended users are informed about the mechanisms and trained on how to use them through training sessions and communications.

The Company seeks to ensure it respects users' human rights and protects them against reprisals, including non-retaliation for raising concerns. The Company monitors the effectiveness of these mechanisms, including the number and types of requests for advice and concerns raised

during the reporting period, the percentage of requests and concerns that were addressed and resolved or found to be unsubstantiated, and how satisfied users are with the mechanisms and the resulting outcomes.

Note: There have been no material instances of non-compliance with laws and regulations during the reporting period and there have been no critical concerns that were communicated to the highest governance body during the reporting period.

Atlantic Navigation Holdings (Singapore) Limited recognizes its responsibility to remediate negative impacts that it identifies it has caused or contributed to. The Company's approach to remediation is based on the United Nations (UN) Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. The Company is committed to providing legitimate processes for remediation, including effective operational-level grievance mechanisms, and cooperating in remediation efforts. The Company's approach to identify and address grievances is centered on establishing effective operational-level grievance mechanisms. The Company has established grievance mechanisms to enable stakeholders to raise concerns about the Company's potential and actual negative impacts on them, including impacts on their human rights.

The Company engages in remediation efforts through various processes, such as conducting impact assessments, engaging with stakeholders, and collaborating with relevant authorities and organizations. The Company takes appropriate action to remediate negative impacts identified through these processes, including providing compensation or remediation measures. It recognizes the importance of stakeholder involvement in the design, review, operation, and improvement of grievance mechanisms. Actively seeks and considers stakeholder feedback in the development and improvement of its grievance mechanisms to ensure that they are effective, accessible, and appropriate for addressing stakeholders' concerns.

The Corporate Governance Report 2022 in its entirety can be found on Pages 18 to 41 of the AR2022, which includes references to the GRIs listed below:

- ❖ *GRI 2: 2-9 Governance structure and composition*
- ❖ *GRI 2: 2-10 Nomination and selection of the highest governance body*
- ❖ *GRI 2: 2-11 Chair of the highest governance body*
- ❖ *GRI 2: 2-12 Role of the highest governance body in overseeing the management of impacts*
- ❖ *GRI 2: 2-13 Delegation of responsibility for managing impacts*
- ❖ *GRI 2: 2-15 Conflicts of interest*
- ❖ *GRI 2: 2-18 Evaluation of the performance of the highest governance body*
- ❖ *GRI 2: 2-19 Remuneration policies*

- ❖ *GRI 2: 2-20 Process to determine remuneration*

1.E. Reporting Practice

- ❖ *GRI 2: 2-4: Restatements of information*
- ❖ *GRI 3: 3-2 List of material topics*

This is Atlantic Navigation Holdings (Singapore) Limited sixth sustainability report (“Sustainability Report 2022”), it has reported the information cited in this GRI content index for the period from 1 January 2022 to 31 December 2022 with reference to the GRI Standards, and there are no material changes in the information provided in the fifth sustainability report dated 14 June 2022.

- ❖ *GRI 2: 2-3 Reporting period, frequency and contact point*

Our financial year end is 31 December (“FY”). Therefore, our reporting period would be from 1 January to 31 December. For the purpose of this 6th year report, the reporting period is 1 January 2022 to 31 December 2022, unless otherwise stated.

Pursuant to Catalist Rule 711A, for financial years commenced before 1 January 2022, an issuer must issue a sustainability report for its financial year, no later than 4 months after the end of the financial year unless there has been external assurance being conducted. Our current reporting cycle is to report on the previous financial year’s sustainability activities by 30 April of each year. Sustainability Report 2022 is dated 28 April 2023.

We welcome feedback to the Sustainability Reporting 2022 and its sustainability endeavours. For further questions and information regarding Sustainability Reporting, the contact point would be:

Name: Mr. Hsu Chong Pin
Position: Chief Financial Officer
Organisation: Atlantic Navigation Holdings (Singapore) Limited
Telephone: +971 6 5263577
E-mail: cphsu@amguae.net

❖ *GRI 2: 2-5 External assurance*

External Assurance of Sustainability Report:

Atlantic Group has prepared this report with reference to the GRI Standards. Please also refer to Page 7 on GRI 1: Foundation 2021. We have relied on internal review conducted in accordance with the International Standards for the Professional Practice of Internal Auditing issued by The Institute of Internal Auditors to review the current sustainability reporting processes. No external assurance has been sought for this Report.

External Assurance of Financial Reports:

External assurance over our financial reports is provided by our external auditors: Ernst & Young LLP and is contained in the AR2022.

1.F. Risk Management

❖ *GRI 2: 2-23 Policy commitments*

Principle 9 of the 2018 Code is related to the importance of risk management and internal controls which can be found on Pages 33 and 34 of the AR2022.



Part

2

Stakeholder Engagement, Materiality & Material Topics Alignment

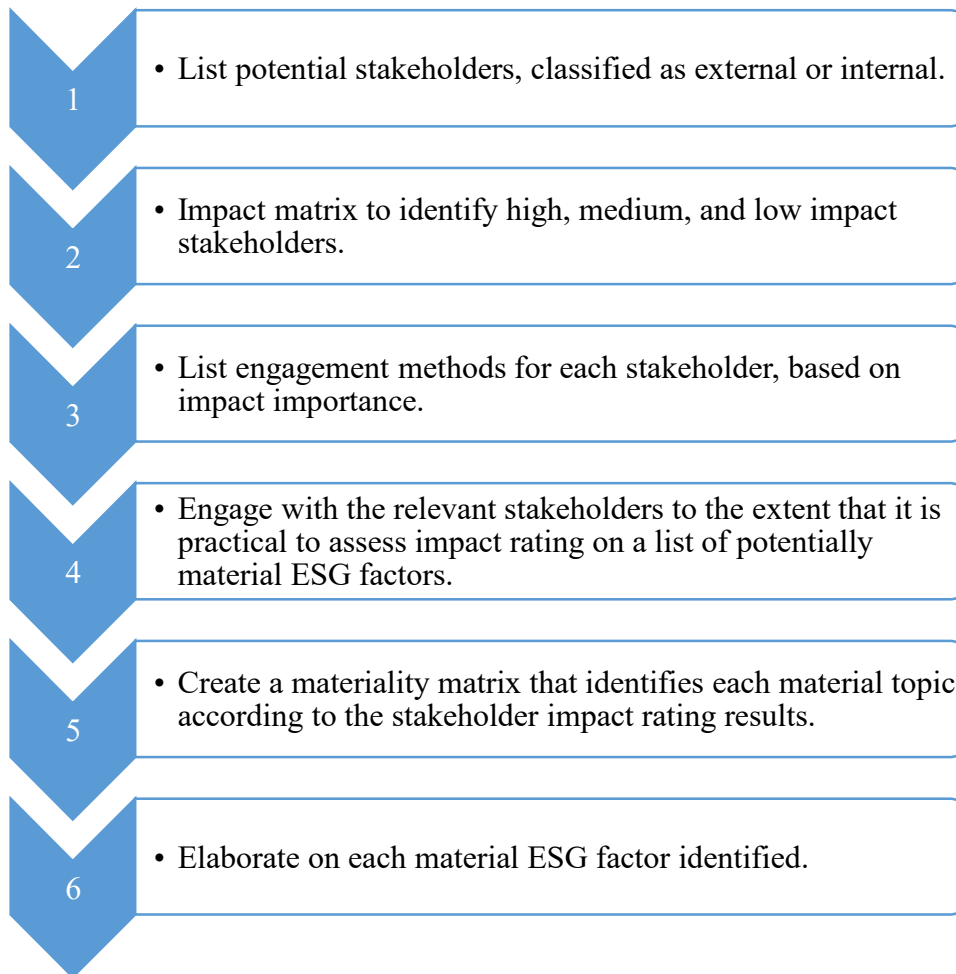
Part 2: Stakeholder Engagement, Materiality & Material Topics Alignment

2.A. Stakeholder Engagement

- ❖ *GRI 3: Material Topics*
- ❖ *GRI 3: 3-1 Process to determine material topics*

The previous sustainability reports provided detailed discussion on our stakeholder-centered approach and process.

Stakeholder-Centered Approach to Materiality



Step 1:

❖ *GRI 2: 2-29 Approach to stakeholder engagement*

The Atlantic Group interacts with and impacts (directly and indirectly) a variety of stakeholder groups. As per previous sustainability reports, the list of 9 potentially relevant stakeholders below, classified as to whether they are internal or external to the organisation, continues to be relevant:

SN#	Stakeholders	Classification
1	Customers	External
2	Employees	Internal
3	Management	Internal
4	Shareholders	Internal
5	Creditors	External
6	Suppliers	External
7	Community	External
8	Government / Regulators	External
9	Competitors	External

❖ *GRI 2: 2-30 Collective bargaining agreements*

The Atlantic Group does not have any collective bargaining agreements with employees or other stakeholders.

Step 2:

❖ *GRI 2: 2-29 Approach to stakeholder engagement*

After listing the 3 internal and 6 external stakeholder groups, assessment was done to determine the stakeholders' relevance based on the impact they have on us, as well as the impact we have on them. A further step adds a column on the right that helps determine the type of engagement with each stakeholder group from highest impact to lowest impact stakeholders.

The results are illustrated in the below Stakeholder Impact Matrix:

Stakeholder Impact Matrix – with Engagement Type

Impact on Atlantic Group	High	-Government/ Regulators - Community	- Shareholders - Suppliers	- Employees - Management	Empower	
			- Competitors - Creditors	- Customers	Collaborate	
	Medium					Involve
	Low					Consult
						Inform
			Low	Medium	High	Type of Engagement
Impact on Stakeholders						

Step 3:

❖ *GRI 2: 2-29 Approach to stakeholder engagement*

After identifying the relevant stakeholders, the Atlantic Group determines how the various stakeholders are engaged with specific engagement methods applied by Atlantic Group towards each of these stakeholder groups as per table below:

**Stakeholder Engagement Methods**

SN#	Stakeholders	Principal Methods of Engagement	
1	Customers	Company website News	Meetings
2	Employees	Company website News Meetings	Employee events / programs Training Bulletins & circulars
3	Management	Company website News Financial statements & other reports	Meetings Bulletins & circulars
4	Shareholders	Company website News Financial statements & other reports	SGX-ST website Meetings Annual General Meetings
5	Creditors	Company website News Financial statements & other reports	Meetings
6	Suppliers	Company website News	Meetings
7	Community	Company website News	Community events
8	Government / Regulators	Company website News Financial statements & other reports	SGX-ST website Meetings Government reports
9	Competitors	Company website News Financial statements & other reports	Meetings (discussion for potential areas of collaboration given similar industry)

Steps 4:

2.B. Identification of Materiality & Material Topics

After determining the most significant stakeholders and their engagement methods, the next step is to assess the ESG topics that are most material under present circumstances and working environment. Selected internal stakeholders, especially management and employees, were engaged to conduct an impact rating assessment on a list of potentially material ESG topics.

In view of the intense industry competition and challenging market environment, balancing the disclosure requirement with commercial sensitivities while bearing in mind the Atlantic Group’s continual strong emphasis on sustainability as guiding principles, the Atlantic Group assesses the material ESG topics as classified by their specific ESG elements as key areas of focus for Sustainability Reporting 2022.

Step 5:

Material Topics – by ESG Classification and Materiality Matrix

❖ *GRI 3: 3-2 List of material topics*

Based on the above discussion, we have identified the following material topics segregated by ESG Classification and Materiality Matrix consistent with Sustainability Report 2022:

Topic #	Topic	By ESG Classification
1	Environmental Protection and Compliance	Environmental
2	Occupational Health and Safety	Social
3	Human Resource Management, Diversity and Equal Access	Social
4	Economic Performance	Governance & Economic
5	IT Process automation and Cyber security	Governance & Economic

By Materiality Matrix

Importance to Stakeholders	High			<ul style="list-style-type: none"> - Environmental Protection and Compliance - Economic Performance
	Medium			<ul style="list-style-type: none"> - Occupational Health and Safety - Human Resource Management, Diversity and Equal Access - IT Process Automation and Cyber Security
	Low			
		Low	Medium	High
Impact on Atlantic Group (i.e. internal)				



Part

3

**Environmental
Factors
(GRI: 300)**

Part 3: Environmental Factors (GRI: 300)

3.A. Material Topic #1: Environment Protection and Compliance

3.A.1. Current Policies, Practices and Performance

The Group is committed to a strong set of environmental principles with our overall policy being to minimise the negative impact to the environment associated with our business operations. It is the intention of the Group to conduct all of its operations in such a manner as to minimise any actions that may endanger or harm the environment.

AGM FZE is certified to ISO 14001:2015, Environmental Management System since 2016. We strive to minimise our carbon footprint, manage our water discharge, reduce our wastage, ensuring strict compliance to environmentally friendly practices. We follow all applicable regulatory compliance standards to prevent pollution or environmental damage to land, water and air environments.

One of the main policies and the most effective way to protect the environment is to maintain a young and efficient fleet thereby reducing energy (including fuel consumption) utilisation and emissions. In this regard, the Group had in June 2022 disposed one of its vessels, AOS Honour with year-built being 2006, and in October 2021 disposed 2 of its vessels, i.e. AOS Energy and AOS Star with year-built being 2006 and 2008 respectively, and shall continue to endeavour to manage its relatively young average age of fleet subject to the vessels being relevant to the market.

Energy and Emissions

As a responsible organisation working in the offshore oil and gas industry, the Group pay the utmost care and attention to environment and has taken proactive measures to minimise its carbon footprint.

On an ongoing basis, to improve our fuel efficiency at an operational level, we have developed respective vessel Ship Energy Efficiency Management Plans (“SEEMP”) which AMG fleet vessels are in full compliance with, being mandatory for all vessels of at least 400GT. Furthermore, we operate and in compliance with the regulations of MARPOL – International Convention for the Prevention of Pollution from Ships.

As our fleet uses low sulphur Marine Gas Oil (“MGO”) instead of heavier fuel oils, our entire fleet is already compliant with the stringent sulphur cap regulations which limits sulphur emissions to less than 0.5% m/m by 1 January 2020. The MGO sulphur content ranges from 0.01% to 0.10% m/m which we actively monitor through bunker delivery notes which would indicate the percentage of sulphur at all bunkering operations.

Fuel Management on Vessels

To the extent of supporting and being directed by our clients in time charters, our fleet in general is equipped with established advanced engines with established manufacturers that are outfitted with Engine Control Modules (“ECMs”) which mainly control a series of actuators on an internal combustion engine to ensure optimal engine performance. In addition, these ECMs allow

for continuous monitoring of parameters such as temperature, pressure, fuel oil consumption which provide critical information for the crew for operational decision-making.

Fuel consumption data are analysed by the operations manager and technical team to assess if the values are reasonable in view of the work environment and sea condition. This data also allows comparison with other identical vessels operating in the same field and thereby detect and implement corrective actions for overconsuming vessels.

GHG gas emissions are managed or reduced by the efficient planning of voyages, speed optimisation, just-in-time activities, maintaining optimum trim and ballast, together with well-maintained engines and use of quality fuel oils, with the decrease in FY2022 over FY2021 due mainly to the disposal of a vessel during FY2022, namely AOS Honour.

	FY2020	FY2021	FY2022
Total Fuel Oil Consumption for AMG Fleet Vessels (Tons)	19,817.1	14,201.8	13,574.4
Total Green House Gas Emission (Tons CO ₂ equivalent)	63,533.7	45,531.1	43,519.6

Compliance to International Standards or Regulations

1	SEEMP	Mandatory for all ship of 400GT and all AMG FZE's vessels are in full compliance.
2	IMO 2020 regulation sulphur cap to less than 0.5% m/m	All AMG FZE's fleet vessels are using MGO for Main Engines as well as for Generators of whose sulphur content is less than 0.5% m/m.
3	Ballast Water Management Plan ("BWMP")	AMG FZE's vessels are equipped onboard with the required BWMP approved by flag administration applicable for vessels due for their first International Oil Pollution Prevention ("IOPP") renewal survey after 8 September 2019.

3.A.2. Future Plans & Focus

The Group continues to be committed to a progressive reduction of GHG emissions via a reduction in energy consumed through its operations. The introduction of ERP system implemented in 2020 and online working platforms are expected to reduce the paper documentations. The Group also encourages its employees to utilise technologies such as video-conferencing and online work platforms to limit travel and thereby reduce GHG emissions from transportation.

The International Convention for the Control and Management of Ships' Ballast Water and Sediments ("BWM Convention"), which took effect in September 2017, requires all ships to implement a ballast water management plan ("BWMP"). All ships are also required to monitor ballast water discharge and carry out ballast water management procedures according to a given standard. As at 31 December 2022, AMG had completed the conversion of sea water ballast tanks to freshwater tanks for 8 vessels out of the 15 applicable vessels, thus these vessels are no longer required to obtain the Ballast Water Management Certificate. Moving forward, the Group is progressively completing the conversion of ballast tanks into freshwater tanks in accordance with the vessels' respective special survey schedules, with the last of such conversions relating to 7 vessels to be completed by September 2023, where then the BWMP would no longer be applicable.

3.A.3. Environmental Performance and KPI Targets

For FY2022, we intend to focus on the following Key Performance Indicators ("KPIs"):

#	KPI	FY2020	FY2021	FY2022	FY2022 Target
1	% of sulphur content in fuel	0.01% - 0.10% m/m	0.01% - 0.10% m/m	0.01% - 0.10% m/m	Continue to be in full compliance
2	Number of oil spills or hazardous chemical spills	0	0	0	Target to remain at zero
3	Penalties received for violation of environmental rules including MARPOL, SEEMP	0	0	0	Target to remain at zero

We continue to monitor the electricity and water consumption at our main office in Hamriyah, UAE, which includes workshops where the SRM operations are performed. The table below depicts the level of electricity and water consumption for FY2021 and FY2022:

Utilities KPI	Locations	FY2020	FY2021	FY2022	FY2023 Target
Total Electricity Consumption (KWH)	AMG Office & SRM Workshops	274,480	283,920	259,840	To maintain the same activity levels relative to revenue and aim to reduce them further when possible.
	DMC Office and Workshop	NA	25,500	34,320	
Total Water Consumption (Gallons)	AMG Office & SRM Workshop	337,935	284,458	189,133	
	DMC Office and Workshop	NA	38,540	45,540	

While SRM activities had increased significantly by 24.0% from US\$3.4 million in FY2021 to US\$4.3 million in FY2022 (including internal revenue for work on own vessels which are eliminated on group consolidation), total electricity and water consumption for AMG offices and SRM Workshop had declined while increase in total electricity and water consumption for DMC Office and Workshop reflected higher activities during the reporting period over FY2021.



Part

4

Social
(GRI: 400)

Part 4: Social (GRI: 400)

4.A. Material Topic #2: Occupational Health and Safety

4.A.1. Current Policies, Practices and Performance

The Group believes that the safe operation of vessels, safety of its employees (including contractors and all persons working under its control), together with the public are of paramount importance and the overriding responsibilities and considerations in carrying out its diverse marine operations.

The Group maintains strict control programs to monitor and control its operational risks. We remain focused on increasing Occupational Health and Safety (“OHS”) awareness amongst our employees and crew. Structured safety meetings are held and safety trainings were regularly organised for them throughout the year.

The Stop Work policy of the Group provides the authority to all relevant designated employees or contractors to stop an activity if, in his/her opinion or judgment, the activity is deemed to be an unsafe or risky behavior.

As ship manager, AMG FZE has successfully implemented and maintained an integrated QHSE management system in compliance with the requirements of ISM Codes, ISPS code, MLC 2006, ISO 45001:2018, ISO 14001:2015 and ISO 9001:2015 Standards. AMG FZE follows a risk-based approach and proactive method of implementing control measures or taking preventive actions to minimise accident rates as low as reasonably practicable. AMG identifies the work-related health hazards and evaluates the health risks to determine the measures necessary to control those risks to as low as reasonably practicable. These will cover and be applied to, all employees, contractors and third parties at work within company premises.

The Integrated Management System shall apply to all activities, products & services that are under the control of the Company, which includes the following:

- *The Offices of the Company, its subsidiaries, and regional offices*
- *The Workshop and Warehouse facilities of the Company*
- *All the Vessels/Units managed and operated by the Company*

Industrial Standards

As one of the leading offshore companies operating mainly in the Middle East, the Group is fully committed to complying with applicable international standards, regulations and statutory requirements from:

- *International Maritime Organization (“IMO”) conventions*
- *International Convention for the Safety of Life at Sea (“SOLAS”)*
- *Maritime Labor Convention (“MLC”)*
- *International Organization for Standardization (“ISO”)*

❖ *GRI 2: 2-28 Membership associations*

The Atlantic Group complies with various OHS-related standards and accreditations, including as per the table below in addition to other specific requirements from our clients, and receive audit reports concerning our level of compliance to ensure that the Atlantic Group abides by the highest OHS standards:

OHS Standards	Applicability
1 Maritime Labor Convention (MLC)	Mandatory
2 International Safety Management (ISM) System	Mandatory
3 International Organization for Standardization (ISO) 45001:2018 – Occupational Health & Safety Management System (OHSMS)	Voluntary

4.A.2. Future Plans & Focus

Compliance with various OHS standards is critical to continue to serve our existing contracts and to secure and tender for new contracts from clients — whether existing and new. In order to ensure this into the future, we strive to not only meet the current standards, but to also proactively anticipate and prepare our fleet for any future possible OHS standards that may arise — whether from clients or from global/industrial initiatives.

In order to achieve this proactive compliance, we constantly keep ourselves abreast with OHS developments and their impacts through close interactions across the operational divisions as well as external clients, and continuously plan for and implement new measures to improve OHS elements within the Atlantic Group.

4.A.3. OHS Performance and KPI Targets

For FY2023, we intend to focus on the following KPIs in relation to OHS:

#	KPIs	FY2020	FY2021	FY2022	FY2023 Target
1	Number and type of accreditations, standards, and requirements, related to OHS, complied with	3	3	3	To maintain, while in full compliance with MLC, ISM and ISO OHSMS.
2	Number of OHS standards and requirements not complied with	0	0	0	To remain at zero, i.e. in full compliance.
3	Fatalities	0	0	0	To maintain with Zero Fatalities related to occupational health and safety
4	High Consequence Injuries	0	0	0	To maintain with Zero high consequence injuries
5	Number of recordable Injuries	2	0	1	Targeting as low as reasonable practicable
6	Recordable work-related ill health	0	0	0	To remain at zero, eliminating the exposure to hazards contributing to work related health issues

There are no workers who are not employees but whose work and/or workplace is controlled by the organization.

4.B. Material Topic #3: Human Resource Management, Diversity and Equal Access

4.B.1. Current Policies, Practices and Performance

We firmly believe that our employees as a collective group, i.e. human resource, is one of the key stakeholders which drives the operational and financial performances of the Atlantic Group. Having a group of key middle-level management employees in leadership positions to support the Senior Management is a source of competitive advantage whose experience and technical knowledge are crucial to ensuring the long-term sustainability of the Atlantic Group.

Underpinned by tolerance as to faith, religions and personal beliefs, the Atlantic Group believes in and is committed to fair employment practices, with recruitment, promotions and salary increment and benefit enhancement based on merit and continual performance. The key foundation is in fostering a cohesive work force based on teamwork and cooperation and reinforced by open communications across the different levels of the organisation.

❖ *GRI 2: 2-7 Employees*

The Atlantic Group employs permanent staff in the MLS Division which is based in UAE and Saudi Arabia as well as in SRM Division whose operations are based mainly at our workshop in Hamriyah Free Zone, Sharjah, UAE and at Dubai Maritime City (DMC). The MLS Division is supported by employees including those in corporate functions such as Human Resource, Finance and Administration, Legal which in turn also supports the operations of the SRM Division. The employees in the SRM Division are mostly semi-skilled or general laborers and are supplemented by daily-rated workers if required.

Crew members work onboard vessels are not deemed as permanent employees as they are mainly on contracts on a “3 months on, 3 months off” basis, with crew personnel and numbers on each vessel complying with class society and other requirements and supplemented by further crew members in consultation with the end-client if need be. As at 31 December 2022, there were 270 crew members onboard as compared to 303 as at 31 December 2021.

The salient information of the Group employees as segregated is as follows:

Employee Information Segregation (Number count, except % as indicated)	As at 31 Dec 2020	As at 31 Dec 2021	As at 31 Dec 2022
Overall	167	172	176
- Countries Represented	21	20	20
- Concentration of Top 5 countries* represented	83.2%	83.7%	86.9%
Division: MLS	86	79	72
Of which based at:			
- UAE	67	64	59
- Saudi Arabia	19	15	13
Diversity:			
- Countries Represented	17	16	14
- Concentration of Top 5 countries* represented	76.7%	72.0%	79.2%
Division: SRM, based at Hamriyah Free Zone, Sharjah, UAE	81	93	104
Diversity:			
- Countries Represented	8	10	10
- Concentration of Top 5 countries* represented	93.8%	93.5%	94.2%

* Top 5 countries for are mainly from India, Bangladesh, Pakistan, as well as Singapore and Philippines.

Note: The information presented above pertains to full-time, permanent employees only, as the Group does not employ any temporary employees, non-guaranteed hours employees, part-time employees, or workers who are not employees.

Our Corporate Social Responsibilities (“CSR”) Initiatives

For many years, the Atlantic Group has been involved in the annual Singapore Food Fair held in Dubai, UAE. This is annual charity event being organised and collaborated with our Singapore Consulate, Dubai. Singaporeans who reside in UAE are encouraged to participate in this annual event. A percentage of the sale proceeds from our stall would be contributed to a local registered UAE charity organisation as nominated by our Singapore Consulate. During the main festive periods such as Chinese New Year, Ramadan, Eid, Diwali and Christmas, as a gesture of support and unity during such festivities, we distribute free meals to workers and staff. During the UAE national day, we contribute and donate small amount of money to Hamriyah Free Zone, Sharjah, UAE where we operate to contribute to festivities and celebrations.

In view of the COVID-19 pandemic, the abovementioned activities have ceased temporarily in FY2021 and FY2022. The Group will look to continue these initiatives at the appropriate juncture.

4.B.2. Future Plans & Focus

Diversity of Nationalities in Workforce

Given that the UAE's population profile comprises of about 80% expatriates, our permanent employees come from various countries with different cultures, educational backgrounds and work experience. We will continue to be mindful of the number of nationalities represented as well as the concentration in numbers so that no nationality dominates the workforce and the Atlantic Group continues to benefit from cultural diversity.

Staff Turnover

Staff turnover was marginally reduced in FY2022 as compared to FY2021. We intend to stabilize the staff turnover so that with a more stable base of employees, it would lead to continuity and enhanced productivity and efficiency through familiarity and team cohesiveness as well as grooming longer-serving employees with growth potential to leadership positions through accumulation of experience at the Atlantic Group.

Gender Mix and Equal Access

Traditionally, the offshore oil and gas industry where our MLS and SRM Divisions serve are staffed by the male gender. While overall consideration are based on merit and suitability based on nature of job scope, we strive to equal access by placing emphasis on gender mix so that there is further diversity to benefit from more well-rounded perspectives and diversity of views with female staff participation in the Atlantic Group. More importantly, we aspire to fill leadership and supervisory positions with female staff especially in more relevant areas involving corporate functions where the Atlantic Group will benefit from leadership balance and diversity and with a view to enhance efficiency over time.

To the extent that it is within our control, given the traditional, cultural and resource backgrounds in Saudi Arabia and nature of work where SRM work is less suitable to the female gender, we will primarily focus on enhancing the diversity and gender mix on the workforce in UAE within MLS where our female employees currently reside.

4.B.3. Human Resource Performance and KPI Targets

For FY2023, in view of the above discussion, we intend to focus on the following KPIs in relation to Human Resource as a key stakeholder group:



#	KPIs	FY2020	FY2021	FY2022	FY2023 Target
1	Group overall: Diversity of workforce with countries representation; Concentration of Top 5 countries represented	21 Nationalities; 83.2%	20 Nationalities; 83.7%	20 Nationalities; 86.9%	Continue to monitor for stability of workforce
2	Staff Turnover (%)	22.0%	21.8%	17.2%	Target to reduce for continuity, allowing for stability of organisation, promotion and career progression for employees
As at 31 December:					
3	Gender Mix, i.e. Female staff as proportion of all staff in MLS Division in UAE	23.9% 16 out of 67	20.3% 13 out of 64	16.9% 10 out of 59	To monitor and review for scope for increase, where enhanced female diversity and leadership would result in incremental benefit to the organization. The decrease in female representation and compensation percentage in FY2022 was attributed to resignations resulting from personal reasons, such as pursuing marriage and family obligations.
4	Female staff in Leadership and Supervisory Positions	8	7	4	
5	Salaries of Female in Leadership and Supervisory Positions as % of Total Salaries in MLS Division in UAE	14.6%	8.7%	6.8%	
6	Salaries of All Female staff as % of Total Salaries of MLS Division in UAE	18.1%	11.6%	10.5%	

(continued)

#	KPIs	Metric	FY2020	FY2021	FY2022
1	Current employees by gender	Males	89.8%	91.9%	93.8%
		Females	10.2%	8.1%	6.2%
2	Age-Based Diversity	Current employees by age groups:			
		(a) under 30 years old	12.8%	12.8%	12.5%
		(b) 30-50 years old	73.2%	61.6%	68.2%
		(c) over 50 years old	14.0%	25.6%	19.3%
		New hires by age groups			
		(a) under 30 years old	31.0%	19.0%	23.5%
		(b) 30-50 years old	61.9%	67.6%	67.6%
		(c) over 50 years old.	7.1%	13.4%	8.9%
		Turnover by age groups:			
		(a) under 30 years old	22.2%	5.4%	10.0%
(b) 30-50 years old	55.6%	83.8%	63.3%		
(c) over 50 years old.	22.2%	10.8%	26.7%		
3	Employment	Total turnover	36 employees; 22.0%	37 employees; 21.8%	30 employees; 17.2%
		Total number of employees *	167	172	176

* Total number of employees as at end of reporting period includes employees across all divisions in all subsidiaries.



Part

5

**Governance &
Economic
Factors
(GRI: 200)**

Part 5: Governance & Economic Factors (GRI: 200)

5.A. Material Topic #4: Economic Performance

5.A.1. Current Policies, Practices and Performance

With the COVID-19 pandemic generally abating since 2022, the global economy has witnessed a recovery, particularly in the oil and gas industry. National oil companies (NOCs) have re-commenced and initiated new projects, leading to increased demand and rising oil prices. The offshore oil & marine sector, previously experiencing financial strain due to oversupply and low oil prices, has now regained momentum. As a result of the positive developments aforementioned, companies like the Atlantic Group have been able to operate with reduced financial pressures.

The Atlantic Group has been able to increase its investments in capital expenditures, such as upgrading and maintaining its vessel fleet, while continuing to meet financial commitments such as servicing loans and interest payments. Furthermore, the Company has been able to capitalize on the increased demand by adjusting charter rates, resulting in improved financial performance.

In light of these developments, the Atlantic Group has strengthened its financial position, allowing it to improve overall business operations and enhance its reputation in the industry. The company's success is a testament to its resilience and ability to adapt to changing market conditions, and it continues to remain well-positioned to capitalize on future opportunities in the offshore oil & marine sector.

The Earnings Before Interest, Taxes, Depreciation and Amortisation as adjusted for non-cash items (“Adjusted EBITDA”) are tabulated, and together with the fleet utilisation rates, are disclosed in our quarterly financial results announced on SGX since 2QFY2019. These information provide indications of the economic performance leading to the cash generation abilities of the Atlantic Group to meet payment obligations to creditors and suppliers as well as to fulfil the capital and maintenance expenditures due to annual and special surveys in the upkeep of vessels to sustain operational performance.

5.A.2. Future Plans & Focus

Our Response to Challenges

With the improved market conditions and the rebound from the COVID-19 pandemic, the focus of the Atlantic Group has shifted towards maintaining a higher fleet utilisation rate to take advantage of the increased demand for our vessels.

Sustaining a high utilisation rate allows us to generate higher revenue and cash flows while minimising operating expenditures without affecting operations. Additionally, maintaining a high utilisation rate of our vessel fleet is not only beneficial for our economic objectives but also for our various stakeholders, including customers, employees, creditors, and suppliers. As a result

of our sustained efforts, we have achieved an improved Adjusted EBITDA, and our debt and gearing ratio have also improved, reflecting the strength of our operations and our commitment to achieving our financial goals.

Looking ahead to FY2023, the focus of the Atlantic Group will remain on sustaining the overall utilisation rate of our fleet. We believe that maintaining a high utilisation rate of our vessel fleet will continue to be crucial to our success, as it allows us to maximise revenue and minimise costs. To achieve our goals for FY2023, we will continue to focus on our long-term contracts and work closely with our customers to meet their evolving needs. We will also invest in our vessel fleet to ensure that we can continue to provide high-quality services that meet or exceed industry standards.

5.A.3. Economic Performance and KPI Targets

For FY2023, in view of the discussion above, we intend to focus on the following KPIs:

#	KPIs	FY2020	FY2021	FY2022	FY2023 Target
1	Sustaining the fleet utilisation rate	80.70%	73.70%	91.40%	Maintain the high utilization rate and try to improve it further.
2	Adjusted EBITDA generation	US\$13.9 million	US\$8.5 million	US\$25.1 million	Continued growth in Adjusted EBITDA as market conditions remain favorable. Target to continue its best effort to achieve its business objectives.
3	Gearing ratio	52.41%	54.32%	45.18%	To maintain or further reduce the gearing ratio compared to FY2022 i.e. net debt* divided by total capital** plus net debt

* Net debt comprises of loans and borrowings, trade and other payables, other liabilities, less cash and bank balances in aggregate.

**Total capital refers to equity attributable to owners of the Company.

The Atlantic Group continue to work closely with our various stakeholders to overcome to achieve the above objections. While the above economic KPIs are areas of focus and aspirational targets, they are not to be construed as forecast or prospect statements.



5.B. Material Topic #5: IT Process Automation and Cyber Security

5.B.1. Current Policies, Practices, and Performance

IT Process Automation

The Atlantic Group is continually seeking to improve its work flows and processes and enhance its efficiency, and effectiveness. One of the key areas of focus where such improvements can be achieved is through the IT system which integrates the various functions of the Group across departments from purchase requisition, raising of purchase orders, delivery notes and invoicing as well as interfacing with Human Resources (“HR”) including crewing and payroll requirements.

Given the nature and importance of IT and the related issues of connectivity and use of applicable software and licensing, the Atlantic Group has been investing and adopting IT initiatives relating to the above to achieve its end objective to enhancing productivity. With the increased levels of activities and complexities in our operations across different countries, the focus has been to upgrade our IT softwares to improve efficiencies with enhanced Management Information System (“MIS”) capabilities to better enable, amongst others, revenue and cost analysis, and strategic decision making.

In view of the strategic importance of IT, ensuring robust data protection and security is of paramount importance to the Atlantic Group. Our efforts are focused on business continuity through secured hosting and back-up retrieval as contingency in events of disruptions caused by natural environmental events and mishaps (such as flooding, fire etc) or deliberate means through attempted unsavoury IT attacks and security breaches with adoption of adequate firewalls and updating of security patches and undergoing training to keep abreast of latest threats and developments.

5.B.2. Future Plans & Focus

The Atlantic Group intends to continue to review our requirement and invest in where required to upgrade its IT processes and systems, embrace new technologies, and conduct training to enhance efficiency through connectivity and communications and able to react and respond to clients and operating demands in a timelier manner. A new ERP was implemented successfully in 1st quarter of FY2020.

We will continue to enhance the capability of the new ERP software with further customisation to allow further efficiency emanating from its MIS capabilities.

International Maritime Organization (IMO) - Cyber Security

As per IMO, maritime cyber risk refers to a measure of the extent to which a technology asset could be threatened by a potential circumstance or event, which may result in shipping-related operational, safety or security failures as a consequence of information or systems being corrupted, lost or compromised. Cyber risk management then encompasses the processes of

identifying, analyzing, assessing and communicating a cyber-related risk and accepting, avoiding, transferring or mitigating it to an acceptable level, considering costs and benefits of actions taken to stakeholders.

With the overall objective to support safe and secure shipping being operationally resilient to cyber risks, the Maritime Safety Committee, at its 98th session in June 2017, adopted among others, Resolution MSC.428(98) - Maritime Cyber Risk Management in Safety Management Systems (“SMS”). The resolution encourages companies to ensure that cyber risks are appropriately addressed in existing safety management systems (as defined in the ISM Code) no later than the first annual verification of the company's Document of Compliance (“DOC”) from 1 January 2021.

The Atlantic Group has completed the formalisation of policy and procedure manuals for communications between on-shore staff and off-shore crew to ensure the data security and consistency of data transmission for safe and secure vessel operations. Maritime Cyber threat management is based on Confidentiality, Integrity and Availability, i.e. “CIA” model when assessing the impact levels. Annual DOC Audit including Cyber Risk Management assessment was completed on 12 April 2022.

5.B.3. IT Performance and KPI Targets

For FY2023, in view of the discussion above, we intend to focus on the following KPIs:

#	KPIs	FY2020	FY2021	FY2022	FY2023 Target
1	Dedicated IT Staff to support operations	3	2	2	To remain at 2 with stabilised operations
2	IT Expenditure and Investments (US\$'000, estimated)	109.6	72.9	85	Target to commensurate with activities, IT compliance and data security enhancement initiatives, expected to be higher than to FY2022
3	Compliance with IMO – Maritime Cyber Risk Management in SMS	In compliance with the applicable regulations	In compliance with the applicable regulations	In compliance with the applicable regulations	To keep abreast of and update manuals and procedures to comply with new requirements, if any



Part

6

GRI Content Index

Part 6: GRI Content Index

Atlantic Navigation Holdings (Singapore) Limited has reported the information cited in this GRI content index for the period from 1 January 2022 to 31 December 2022 with reference to the GRI Standards.

Item	Disclosure Requirement	Reference	Page
GRI 1: Foundation 2021		Sustainability Report 2022	SR 7
GRI 2: General Disclosures		Sustainability Report 2022 - Part 1 & 2	SR 3-20
2-1	Organizational details	Sustainability Report 2022	SR 4-7
2-2	Entities included in the organization's sustainability reporting	Sustainability Report 2022	SR 7
2-3	Reporting period, frequency and contact point	Sustainability Report 2022	SR 12
2-4	Restatements of information	Sustainability Report 2022	SR 12
2-5	External assurance	Sustainability Report 2022	SR 13
2-6	Activities, value chain and other business relationships	Sustainability Report 2022	SR 4, 7
2-7	Employees	Sustainability Report 2022	SR 30-34
2-8	Workers who are not employees	Sustainability Report 2022	SR 31
2-9	Governance structure and composition	Annual Report 2022	AR 18-41
2-10	Nomination and selection of the highest governance body	Annual Report 2022	AR 23-29
2-11	Chair of the highest governance body	Annual Report 2022	AR 23
2-12	Role of the highest governance body in overseeing the management of impacts	Annual Report 2022	AR 18-41
2-13	Delegation of responsibility for managing impacts	Annual Report 2022	AR 18-41
2-14	Role of the highest governance body in sustainability reporting	Sustainability Report 2022	SR 8
2-15	Conflicts of interest	Annual Report 2022	AR 18-41
2-16	Communication of critical concerns	Sustainability Report 2022	SR 15-18
2-17	Collective knowledge of the highest governance body	Annual Report 2022	AR 18-22
2-18	Evaluation of the performance of the highest governance body	Annual Report 2022	AR 30
2-19	Remuneration policies	Annual Report 2022	AR 30-33
2-20	Process to determine remuneration	Annual Report 2022	AR 30-33
2-21	Annual total compensation ratio	Annual Report 2022	AR 32-33



(Continued)

Item	Disclosure Requirement	Reference	Page
2-22	Statement on sustainable development strategy	Sustainability Report 2022	SR 8-9
2-23	Policy commitments	Sustainability Report 2022	SR 9-11
2-24	Embedding policy commitments	Sustainability Report 2022	SR 9-11
2-25	Processes to remediate negative impacts	Sustainability Report 2022	SR 9-11
2-26	Mechanisms for seeking advice and raising concerns	Sustainability Report 2022	SR 9-11
2-27	Compliance with laws and regulations	Sustainability Report 2022	SR 9-11
2-28	Membership associations	Sustainability Report 2022	SR 28
2-29	Approach to stakeholder engagement	Sustainability Report 2022	SR 16-18
GRI 3: Material Topics			
3-1	Process to determine material topics	Stakeholder Engagement	SR 15-17, 19-20
3-2	List of material topics	Sustainability Report 2022	SR 12, 19-20
GRI: 200: Economic		Sustainability Report 2022 - Part 5	SR 36-39
GRI: 300: Environmental (Task Force on Climate-Related Financial Disclosures)		Sustainability Report 2022 - Part 3	SR 22-25
GRI: 400: Social		Sustainability Report 2022 - Part 4	SR 27-34



Part

7

**Task Force on
Climate-Related
Financial
Disclosures (TCFD)**

Part 7: Task Force on Climate-Related Financial Disclosures (TCFD)

Introduction

In December 2021, the Singapore Exchange Regulation (“SGX RegCo”) announced that all issuers must provide climate reporting on a ‘comply or explain’ basis in their sustainability reports from FY2022 onwards. Furthermore, the Company falls within the energy industry which is subject to mandatory climate reporting for FY2023 onwards. In line with the recommendations of the Task Force on Climate-related Financial Disclosures (“TCFD”) for climate reporting, Atlantic Navigation Holdings (Singapore) Limited aspires to disclose to the extent that it is practicable on how the Group manages climate-related risks and opportunities, with reference to the four key pillars recommended by TCFD.

Governance

The Company is headed by an effective Board which is collectively responsible and works with Management for the long-term sustainability of the Company by committing to maintain a high standard of corporate governance within the Atlantic Group to safeguard the interests of shareholders and to enhance corporate value and accountability. Please refer to the section on the Corporate Governance from Pages 18 to 41 in the Annual Report 2022

The Board will continue to enhance its corporate governance practices appropriate to the conduct and growth of its business and to review such practices from time to time to ensure compliance with the latest guidelines, rules and regulations which now includes and progressively to be updated the ESG endeavors. The Board also ensures that the necessary financial and human resources are in place for the Company to meet its objectives.

On this basis, the Board shall take into consideration and progressively incorporate the relevant ESG issues under the ambit of the Risk Management Committee and target to be fully comply with the relevant climate reporting requirements from FY2023 onwards.

Strategy

As the circumstances are evolving, the Company is progressively identifying climate-related risks and opportunities and recognizing their potential impacts over the short, medium, and long term with key climate risks include changes in laws & regulations, meeting clients and stakeholder expectations as they become more focused on sustainability and climate change, keeping up with the pace of the global energy transition, and long-term effects of climate change, such as sea-level rise, changes in ocean currents, and changes in weather patterns.

The key strategy of the Atlantic Group in view of the market dynamics and its size is to maintain an efficient fleet of young modern vessels being the most direct and environmental friendly in the short and medium term and is expected to continue to focus in this regard.

Risk Management

As mentioned above, the Atlantic Group has established a Risk Management Committee comprising of relevant senior management of the Company, and at its direction, adopted an enterprise risk management framework and register to identify, manage, and monitor all business and operating risks, including climate-related risks, impacting the Company on an on-going basis. Until a dedicated chief risk officer or its equivalent is appointed, the risk management framework and register will continue to be overseen by the CEO and the CFO and supported by various heads of divisions or business units such as Operations, Finance, IT and Administration. During the financial year, these departments were involved in identifying and evaluating risks from the bottom up, and these risks were then reviewed in consultation with the senior management of the Group to provide a top-down approach to mitigating these risks as well.

The Company acknowledges the importance of identifying, assessing, and managing climate-related risks in its business operations. The Company recognizes that climate-related risks can have a material impact on its financial performance, reputation, and ability to operate. As such, the Company is constantly improving its implementation of processes to identify, assess, and manage climate-related risks. The Management will regularly review the key risks, both existing and emerging new risks, incorporating them to the enterprise risk management framework and register. Preventive controls and mitigation controls are used to manage the respective components of risk as per the appropriate hierarchy of controls to safeguard shareholders' interests and the Company's assets. For further information on our approach to risk management and internal controls, please see Pages 33 and 34 of the Annual Report 2022.

In addition to managing climate-related risks and opportunities under the enterprise risk management framework, the Company is constantly seeking to comply with ABS class certificates and other environmental plans. These plans are very similar to those found under ISO 14001 and ISO 45001 which the Company successfully implemented and maintained an integrated management system in compliance with over the years.

The risk management framework is regularly reviewed and updated to ensure its effectiveness in managing all types of risks, including climate-related risks. The Company is progressively enhancing the integration of its processes for identifying, assessing, and managing climate-related risks into its overall risk management framework through, risk identification, risk assessment and its implication on mitigation and prioritisation.

Metrics and Targets

The Company recognizes that climate change poses material risks and opportunities to its business and is committed to managing and disclosing these risks in line with the recommendations of the TCFD. The Company identified several metrics that are relevant to assess and manage climate-related risks and opportunities and shall progressively provide relevant data to the extent practicable for the industry. For further information on these metrics, please see Pages 21 to 25 of Sustainability Report 2022.

The Company complies with the applicable mandatory standards and abides by relevant treaties for the prevention of marine pollution, including International Maritime Organization (“IMO”) resolutions, the International Convention for the Prevention of Pollution from Ships (“MARPOL”), the International Convention for the Safety of Life at Sea (“SOLAS”), flag administration, Ballast Water Management Plan (“BWMP”), the International Oil Pollution Prevention (“IOPP”), Ship Energy Efficiency Management Plan (“SEEMP”) and other standards regarding sewage, garbage and air pollution, as well as all national, regional and local regulations.

The Company recognizes that GHG emissions pose a material risk to its business, particularly given the increasing focus on decarbonization in the marine industry. The Company is taking steps to manage this risk, including exploring alternative fuels, improving vessel efficiency, and engaging with stakeholders to promote sustainable practices. Direct GHG emissions from sources that are owned or controlled by the Company, such as emissions from combustion of fossil fuels in owned or leased vehicles or equipment. GHG gas emissions are managed or reduced by the efficient operations of the vessels, speed optimisation, just-in-time activities, maintaining optimum trim and ballast, together with well-maintained engines and use of quality fuel oils. For more details on GHG emissions and Fuel Oil Consumption, please see Pages 22 to 23 of our Sustainability Report

With reference and as adjusted for scale of operations, the Atlantic Group is committed to reduce greenhouse gas emissions by 2030 compared to a 2019 baseline and to ensure compliance with applicable and prevalent climate-related regulations.



Part

8

TCFD Content Index

Part 8: TCFD Content Index

TCFD Recommendation Page Reference	Page Reference
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Strategy	44-45
Risk Management	45
Metrics & Targets	46



Part

9

**Index on SGX
Rulebook
Compliance**

Part 9: Index on SGX Rulebook Compliance

Rulebook Clause	SGX Rulebook Requirement	Reference in Report
711 A	Sustainability Report	<ul style="list-style-type: none"> • Throughout
711 B1 a)	Material environmental, social and governance factors	<ul style="list-style-type: none"> • Part 2: Stakeholder Engagement, Materiality & Material Topics Alignment
711 B1 b)	Policies, practices, and performance	<ul style="list-style-type: none"> • Part 3: Environmental Factors • Part 4: Social Factors • Part 5: Governance & Economic Factors
711 B1 c)	Targets	<ul style="list-style-type: none"> • Part 3: Environmental Factors • Part 4: Social Factors • Part 5: Governance & Economic Factors
711 B1 d)	Sustainability reporting framework	<ul style="list-style-type: none"> • Part 1: Overview → 1.A. Corporate Profile → GRI 1: Foundation 2021
711 B1 e)	Board Statement	<ul style="list-style-type: none"> • Part 1: Overview → 1.B. Board Statement
711 B2	Primary content exclusion	Not Applicable