



## FOCL Sustainability Statement

Fred. Olsen Cruise Lines Limited 



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# Sustainability Statement 2023

## 1. (ESRS 1) General information

### 1.1 Basis for preparation

#### BP-1 - General basis for preparation of sustainability statements

This statement is prepared for Fred. Olsen Cruise Lines Limited (FOCL). FOCL is a wholly owned subsidiary of First Holdings (Limited), which in turn is a wholly owned subsidiary of Bonheur ASA (Bonheur). This statement is written specifically for Fred. Olsen Cruise Lines Limited.

#### BP-2 - Disclosures in relation to specific circumstances

Any specific circumstances, and the effect of these circumstances, are described alongside the disclosure to which they refer.

### 1.2 Governance

#### GOV-1 - The role of the administrative, management and supervisory bodies

##### The Board of Directors

The current Board of Directors consists of four Board Members as listed below.

The Board of Directors comprises four shareholder-elected members, of which all three are independent of the Management and material business contacts, the fourth member is part of the Leadership team.

##### Composition and diversity of the Board of Directors

- Number of executive and non-executive members:
  - One executive director
  - Three non-executives
- Representation of employees and other workers: None
- Experience relevant to the sectors, products, and geographic locations of the undertaking:  
Reference is made to short biography of each Board member.
- Percentage by gender and other aspects of diversity: Females 25%, Males 75%
- Independent board members: 0%

Name	Position	Served since
Annette S. Olsen	Director	1998
Richard Olav Aa	Director	2019
Peter Deer	Director	2019
Jeremy Dowler	Director / Secretary	1995

##### Anette S. Olsen, Director (chair)

Anette S. Olsen is the proprietor of Fred. Olsen & Co. which is responsible for the day-to-day operation of Bonheur. As part of these services Anette Olsen holds the position as managing director of Bonheur. Ms. Olsen is chair of the boards of various subsidiaries of Bonheur operating within distinct business segments, hereunder Fred. Olsen Renewables AS, FOO and NHST Media Group AS. She also holds Board positions in inter alia Fred. Olsen Cruise Lines Ltd. and Global Wind Service A/S. Anette S. Olsen holds a Bachelor's Degree in business organization and a Master's Degree in business administration (MBA).

##### Richard Olav Aa, Director

Richard Olav Aa has been related to the Bonheur Group for several years, and currently serves as CFO in Fred. Olsen & Co., the management company for Bonheur. Within the Bonheur Group, he has further extensive experience in serving as board member through a number of board positions. Mr Olav Aa has



previously worked in Telenor ASA, Arendals Fossekompani ASA, Norsk Vekst ASA and Elkem ASA. He holds a Master of Science from Norges Handelshøyskole and is a Norwegian citizen residing in Norway.

#### Peter Deer, Director

Peter Deer has been associated with Fred. Olsen Cruise Lines since 2004 serving as \* Manging Director for this report period. His background is chartered accountancy and finance predominately in maritime transport and the cruise sector. Mr Deer is currently serving as 'Director' in seven other Fred. Olsen associated Companies, these being; Balmoral Cruise Limited, Borealis Cruise Limited, Fred. Olsen House (JV) Limited, Bolette Cruise Limited, Braemar Cruise II Limited, Black Watch Cruise Limited and Boudicca Cruise Limited.

#### Jeremy Dowler, Director / Secretary

Jeremy Dowler is a Fellow of the Institute of Chartered Accountants in England & Wales and an honours graduate of the University of Reading. Mr Dowler trained and qualified with KPMG before joining Fred. Olsen Limited, where he has been a member of the Board since 1995, with particular responsibility for financial matters.

\* Chief Financial Officer 2024

### **Leadership Team**

The Companies Leadership team in the reporting year consisted of five individuals. The names of the members of the team and their respective positions are presented in the table below.

#### Composition and diversity of the Leadership team:

- Number of executive and non-executive members: Five executives, no non-executives
- Representation of employees and other workers: None
- Experience relevant to the sectors, products, and geographic locations of the undertaking: Reference is made to short biography of each member of the Leadership team
- Percentage by gender and other aspects of diversity: Females 40%, males 60%

Name	Position	Served since
Peter Deer	Managing Director	2019
Thomas Rennesland	Hotel Operations Director	2017
Clare Ward	Product and Customer Services Director	2016
Jackie Martin	Sales and Marketing Director	2019
Stuart Ferguson	Head of Quality and Resources	2015

#### Peter Deer, Managing Director

A well-respected leader in the cruise industry, Pete's early focus was financial and commercial followed by a broader scope of management, overseeing all aspects of the operations (marketing, sales, yield, finance, crewing (>2,000 crew), technical etc.)

#### Thomas Rennesland

A trusted and respected leader in the hospitality industry with 30+ years of onboard experience in the cruise industry followed by 7 years of senior management shoreside.

#### Clare Ward

An experienced leader driving revenue growth through change. Developing products and changing ways of working focused on enhancing Brand and Customer Experience. Specialising in UK Travel and Hospitality businesses

#### Jackie Martin

A senior sales and marketing professional in travel, leisure and entertainment with a proven track record of transforming brands, building brilliant teams and making a tangible difference to the bottom line.



### Stuart Ferguson

A qualified Master Mariner with 30 years' experience in the cruise sector. Onboard experiences include Deck Officer, Safety Management, Compliance and auditing. Following a move shoreside he now heads up Quality & Resource) which includes Crew Management, Training and Development, Sustainability, Compliance, Bunker provision & Medical Departments also holding the Designated Person Ashore position.

It should be noted that changes have been made to the Leadership team in 2024.

### Roles and responsibilities of the administrative, management and supervisory body

Responsible for oversight of impacts, risks and opportunities:

- The Board is overall responsible for FOCL's activities. The board and Leadership team; work is conducted in compliance with applicable UK and International laws and regulations relevant to our operations. A FOCL Sustainability Statement will be reviewed and approved by the Board.

How responsibilities for impacts, risks and opportunities are reflected in the undertaking's terms of reference, board mandates and other related policies:

- Management of sustainability impacts, risks and opportunities are covered by FOCL policies (in particular, Sustainability policy, Human Resources 'Crew Management' policies and Environmental policies, all areas are assigned ownership and approved as per our Company 'Responsibility Matrix'.

Management's role in assessing and managing impacts, risks and opportunities:

- It is proposed that the process of assessing and managing Impacts, Risks and Opportunities will be conducted by the Leadership team in the form of working meetings, facilitated by the Head of Compliance and Sustainability.

Setting of targets related to material impacts, risks and opportunities, and how they monitor progress towards them:

- Following on from the previous statement, targets will be set in workshops with the Leadership team and reviewed and approved by the Board

Availability of the appropriate skills and expertise to oversee sustainability matters:

- Reference is made to the above short biography on the individuals in the Board of Directors and the Leadership team. The Leadership team have appointed a dedicated position, Head of Compliance and Sustainability, reporting directly to the head of Quality and Resources. The Head of Compliance and Sustainability (Sandy Powell) has 18 years' experience in the cruise industry predominately in HSSEQ but latterly moving across to compliance and sustainability. He actively takes part in cross company and industry working groups discussing sustainability matters.



## GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The material impacts, risks, and opportunities are assessed during quarterly meetings with the management as a minimum. Further, the impacts, risks, and opportunities and the results and effectiveness of policies, actions, metrics and targets adopted to address them are presented to the Board of Directors at quarterly board meetings and are subject to its review and final approval of the annual sustainability statement.

A list of the material impacts, risks and opportunities addressed by the Leadership team and the Board of Directors during the reporting period is listed in '1.3 Strategy' under the section for 'SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model'

## GOV-3 – Integration of sustainability-related performance in incentive schemes

The incentive schemes for the Leadership team and Board members are not linked to sustainability matters. The incentive schemes are categorised as confidential personnel matter and detailed information on their content is omitted (reference to ESRS 2 BP-1 and ESRS-1 section 7.7).

## GOV-4 – Statement on due diligence

Core elements of due diligence	Paragraphs in the sustainability statement
Embedding due diligence in policies	1.4 Impact, risk and opportunity management
Engaging with relevant stakeholders in all key steps of the due diligence	<p>1.3 Risk management is controlled dynamically rather than in a prescribed manner. Policy and processes relevant to key areas of operation are maintained and supported by key decisions being discussed and made by the Leadership team or Board (dependent on gravity of the subject / outcome)</p> <p>The main sustainability related risks identified are specified in '1.3 Strategy' under the section for 'SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model'.</p> <p><b>Strategy</b></p>
Identifying and assessing adverse impacts	1.4 Impact, risk and opportunity management
Taking actions to address those adverse impacts	1.4 Impact, risk and opportunity management
Tracking the effectiveness of those efforts and communicating	1.5 Metrics and targets

## GOV-5 - Risk management and internal controls over sustainability reporting

Risk management is controlled dynamically rather than in a prescribed manner. Policy and processes relevant to key areas of operation are maintained and supported by key decisions being discussed and made by the Leadership team or Board (dependent on gravity of the subject / outcome)

The main sustainability related risks identified are specified in '1.3 Strategy' under the section for 'SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model'.



### 1.3 Strategy

#### SBM-1 – Strategy, business model and value chain

FOCL operates within a strict environmental framework, and is committed to ensuring that it meets, and where possible, exceeds, regulatory requirements on marine and air pollution.

FOCL monitors – and regularly reviews – its management systems on board its ships, to ensure compliance with international requirements.

The environmental policies contained within the Company's SQM are continuously reviewed and updated to comply with current and projected environmental requirements.

These include policies covering the following core areas:

- Garbage and Waste
- Controlled Oil Discharges
- Black and Grey Water
- Chemical handling
- Energy Efficiency
- Biofouling
- World Heritage Fjords

All FOCL vessels have implemented 'Ship Energy Efficiency Management Plans' ('SEEMP'), in line with the Marine Environment Protection Committee ('MEPC') 63/23 Annex 9.

Fred. Olsen Cruise Lines Limited have a fleet of three ships that operate worldwide. Our client base is drawn mainly from the UK markets catering for guests that recognise and appreciate smaller ship, and an experience on-board that is uncrowded, warm and civilised - treating passengers as guests, like the family-run business we are.

For more details on who we are, our product and location we visit throughout the world please select the following link [Fred. Olsen Cruise Lines Limited](#)

FOCL employs two hundred and ten (210) persons shoreside and has 3329 crew in rotation throughout the fleet, the main characteristics of the employees can be read in more detailed in '3.1.3 S1 Metrics and targets' under the paragraph for 'S1-6 - Characteristics of the undertaking's employees'.

FOCL does not have any activities in:

- i) Fossil fuel sector
- ii) Chemical production
- iii) Controversial weapon such as anti-personnel mines, cluster munitions, chemical weapons, and biological weapons
- iv) Cultivation and production of tobacco

Fred. Olsen Cruise Lines (FOCL) are a cruise operator offering hand crafted cruises to a predominately UK market. We operate out of strategically selected UK ports offering our guests convenient travel time to our ships helping to reduce their Co2 footprint before embarking on their selected cruise. As our ships are 'smaller' we can offer travel to places throughout the world our competitors are choose not to visit.

FOCL's main assets include the three operating cruise ships with a fourth remaining in lay-up due to Covid-19 and our head office in Ipswich (Suffolk, England)

The option to seek exemption form 'Article 18, paragraph 1, sub-point (a) of Directive 2013/34/EU' has not been used.



Business profile:

<b>Industry/Sector</b>	- Sea and Coastal Passenger Water Transport
<b>Geographical presence</b>	- Worldwide
<b>Own business activities</b>	- Operator of cruise ships <ul style="list-style-type: none"> <li>o Crewing</li> <li>o Operation of vessels</li> <li>o Purchasing</li> <li>o Maintenance of vessels</li> <li>o Sales</li> <li>o Planning</li> <li>o Project Management</li> <li>o Technical support</li> </ul>
<b>Geographical presence</b>	- UK - Worldwide trading

Dependencies:

Area	The resources FOCL are dependent on
Human	- Own workforce health and wellbeing
Social	- Community relationships - Owners relationship - Customer relationships - Supplier relationships
Nature	- Fuel oil

Main processes:

- 01. Policy and Documentation
- Environmental
- Human Resources
- IT
- Planning and Destinations
- Public Health
- Purchasing
- Safety
- Security
- Technical
- Training and Development

FOCL have the following defined support processes:

- Management
- Technical
- Health and Safety
- Human Resources
- DPA

FOCL recognise the importance of maintaining a healthy relationship with supplier that offer upstream products and services, this relationship ensures our downstream products and services meet the high expectation we expect for our guests and onboard operations. Our suppliers are based throughout the world based on cruise itinerary, availability, and quality.





### SBM-2 – Interest and views of stakeholders

FOCL is committed to creating value for its stakeholders by addressing the most relevant economic, environmental, and social impacts of our businesses. FOCL has identified our key stakeholder groups based on their interest and influence on our operations, as well as their potential to benefit from or be affected by our activities. These groups include employees, investors, suppliers, partners, customers, regulators, and the general public. FOCL engages with our stakeholders through various channels and methods, we listen to the views and expectations of our stakeholders and responds to their concerns and suggestions.

Stakeholder group	Who are they?	Which sustainability topics do they care about?	How do we engage with them?
<b>Employees</b>	<ul style="list-style-type: none"> <li>The Board</li> <li>Directors and Leadership Team</li> <li>Designated Person Ashore</li> <li>Technical Managers (Fred. Olsen Cruise Technical)</li> <li>Safety and Security Manager</li> <li>Responsible Persons (relevant to SQM content)</li> <li>All on-board crew</li> <li>All shoreside employees</li> </ul>	<ul style="list-style-type: none"> <li>Social issues</li> <li>Health and Safety</li> <li>Working conditions</li> <li>Welfare</li> <li>Salary</li> <li>Price</li> </ul>	<ul style="list-style-type: none"> <li>Crew surveys (via Manning Agent)</li> <li>Crew / management meetings</li> <li>Policies</li> <li>Local management engagement                             <ul style="list-style-type: none"> <li>Owners</li> <li>Managers</li> <li>Supervisors</li> <li>DPA</li> </ul> </li> </ul>
<b>Customers</b>	<ul style="list-style-type: none"> <li>Guests (Passengers)</li> </ul>	General	Targeted research groups
<b>Investors</b>	<ul style="list-style-type: none"> <li>Bonheur</li> <li>Financial Investors</li> </ul>	<ul style="list-style-type: none"> <li>Environmental</li> <li>Social</li> <li>Governance</li> </ul>	<ul style="list-style-type: none"> <li>Via our annual Sustainability Report</li> <li>Periodic meetings to discuss Sustainability matters</li> <li>Board Meeting</li> <li>Return on Investment</li> </ul>
<b>Regulators</b>	<ul style="list-style-type: none"> <li>Port State (relevant to ports)</li> <li>Classification (DNV)</li> <li>Flag State (BMA)</li> <li>CLIA (Cruise Lines International Association)</li> <li>UK Chamber of Shipping</li> <li>ABTA (The Travel Association)</li> <li>CAA (Civil Aviation Authority)</li> <li>HMRC (HM Revenue and Customs)</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with relevant regulations</li> <li>Emissions</li> <li>Carbon taxation (ETS)</li> </ul>	<ul style="list-style-type: none"> <li>Reporting</li> <li>Auditing</li> <li>Inspections</li> <li>Direct engagement                             <ul style="list-style-type: none"> <li>Calls</li> <li>Meetings</li> <li>Seminars</li> </ul> </li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>Port Authorities</li> <li>Port Services</li> <li>Bunker Services</li> <li>Contract Maintenance Suppliers (Dry Dock)</li> <li>Public Health Bodies</li> <li>Safety Equipment Providers</li> <li>Manning Agents</li> <li>Human Resources (Shore Based)</li> <li>IT Services (Shore Based)</li> <li>Hotel Supplier</li> <li>Marketing Services Suppliers</li> <li>Travel providers</li> <li>Insurance Companies</li> <li>Legal Service Providers</li> <li>Administration Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with regulations</li> <li>Use of shore power connections</li> <li>Waste offload</li> <li>Bunkering</li> </ul>	<ul style="list-style-type: none"> <li>Planning stage</li> <li>During visit</li> <li>Direct communications / negotiations</li> </ul>
<b>Civil society</b>	<ul style="list-style-type: none"> <li>Ports we visit</li> </ul>	<ul style="list-style-type: none"> <li>Environmental Impact on the location (Emissions)</li> <li>Impact we have on the community                             <ul style="list-style-type: none"> <li>waste</li> <li>local economy</li> <li>social interactions</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Via the Port Agent</li> <li>Via local suppliers (tours)</li> <li>Interactions with local dignitaries</li> <li>Interactions with local community</li> </ul>

### SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Topic	Subtopic:	Sub-subtopic:	Description:	Expected time horizons
E1 Climate change	Climate change mitigation		<ul style="list-style-type: none"> <li>Positive impact:</li> <li>- Opportunities to utilise shorebased power</li> </ul>	Not assessed



			<ul style="list-style-type: none"> <li>- Improved energy efficiency measures</li> </ul> <p>Risks:</p> <ul style="list-style-type: none"> <li>- Increased Capex costs</li> <li>- Increased fuel costs</li> <li>- Potential to fall behind competitors</li> </ul> <p>Opportunities:</p> <ul style="list-style-type: none"> <li>- Potential reduced operating costs</li> <li>- Supporting global investment in green technology</li> </ul>	
E1 Climate change	Energy		<p>Negative impact:</p> <ul style="list-style-type: none"> <li>- Our Fleet consumes fossil fuels</li> </ul> <p>Positive impact:</p> <ul style="list-style-type: none"> <li>- Support global investment in green technology</li> <li>- Increased usage of shorebased power</li> </ul> <p>Risks:</p> <ul style="list-style-type: none"> <li>- Increased fuel costs</li> <li>- costs associated with transition to carbon neutral operation</li> <li>- Potential to fall behind competitors</li> </ul> <p>Opportunities:</p> <ul style="list-style-type: none"> <li>- Potential reduced operating costs</li> </ul>	Not assessed
E2 Pollution	Pollution of air		<p>Negative impact:</p> <ul style="list-style-type: none"> <li>- Our fleet emits NOx, Sox and PM to the air</li> </ul> <p>Positive impact:</p> <ul style="list-style-type: none"> <li>- We are able to reduce Sox emissions using exhaust gas cleaning systems</li> </ul> <p>Risks:</p> <ul style="list-style-type: none"> <li>- Costs associated with EU ETS</li> </ul> <p>Opportunities:</p> <ul style="list-style-type: none"> <li>- To invest in greener technologies</li> <li>- To explore alternative fuels</li> </ul>	Not assessed
E5 Circular Economy	Waste		<p>Risks:</p> <ul style="list-style-type: none"> <li>- Potential lack of control of waste types will result in increased costs from shoreside waste facility</li> <li>- Uncontrolled onboard waste generation will result in increased costs</li> </ul> <p>Opportunities:</p> <ul style="list-style-type: none"> <li>- Closer working relationship with waste reception facilities will ensure we effectively manage or waste stream</li> </ul>	Not assessed



S1 Own Workforce	Working conditions	Secure employment	Opportunities: - Potential to minimise costs on recruitment, training and certification costs	Not assessed
		Health and safety	Negative impacts: - Personnel incidents occurring onboard result in injured persons. - A lack of compliance to onboard H&S policies may result in hazards in the working environment and living areas.	
	Equal treatment and opportunities for all	Training and skills development	Risks: - Underdeveloped / trained crew may lead to a waste of resource onboard - Lack of development / training may lead to crew / employees leaving the business resulting in additional hiring costs	

Positive impacts align with our continued focus on improving our environmental credentials in line with improved technologies, operating cruise ships comes with obvious environment impacts such as emitting CO2 to the atmosphere, pollution to air, pollutions to sea and health and safety risks working on a vessel. FOCL is responding to the effect of Climate change mitigation and CO2 emission by investigating new technologies and in the strategy. However, FOCL have used the option to omit this information from the sustainability statement. Reference is made to ESRS 2 BP-1.

#### 1.4 Impact, risk and opportunity management

##### IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

Materiality assessment seeks to identify which sustainability matters are material for FOCL. The assessment is an important foundation for a company's resource allocation and contributes to the strategic work of the company. The purpose of this disclosure is to provide an understanding of the process FOCL have used to determining the disclosure in our sustainability reporting.

##### Methodology

Prior to identifying a list of positive and negative impacts, FOCL assessed the ESRS topics and determined what areas of the framework are relevant to our operations and (if applicable) our stakeholders. We have adopted a 'top-down' approach, assessing each topic, sub-topic and sub-sub-topic to interpret the relevance to our Company. Impacts, risks, and opportunities were highlighted and then assigned a 'Priority' score that indicated if the topic is material to FOCL, as described below.

##### Process actual and potential impacts

Actual and potential impacts were identified using the process as described above, the results were reviewed and approved by members of the Leadership Team.

When assessing if an item was to be classified as 'material' a review was completed using two parallel scales:

##### Impact materiality – Positive / Negative impacts

Three parameters were included to provided context to the relevant ESRS topic, each scored as per the below graphic.

The sum of sum of scale, scope and irremediability /3 = Consequence

Probability = an assessment of frequency that the topic will become a material impact to our operation



Priority = Consequence x Probability indicated a in a range 'low, medium, high'

Scale	Scope	Irremediability	Probability	Priority
Absolute	Global/total	Non-remediable	Almost certain, it is expected to occur (>50%)	High 10-25
High	Widespread	Very difficult to remedy or long term	Likely, there is a strong possibility that it will occur (25-50%)	
Medium	Medium	Difficult to remedy or mid-term	Possible, there is a history of occurrences (5-25%)	Medium 5-9
Low	Concentrated	Remediable with effort (time & cost)	Not expected, but it may occur at some time (1-5%)	Low 1- 4
Minimal	Limited	Relatively easy to remedy short term	Unlikely, but it may occur exceptionally (0-1%)	

#### Financial materiality – Risk and Opportunities

When identifying financial risks and opportunities, the list of material impacts was used as a starting point, a secondary assessment attributing a financial cost to each items was conducted to determine if the subject was to be considered 'material'. Furthermore, the company risk and opportunity register was assessed to identify if any of the exciting risks or opportunities were linked to a sustainability topic

The prioritisation of materiality is as follows:'

Materiality 10 – 25	High	Material topic. Disclose requirements (including application requirements) related to that specific sustainability matter in the corresponding topical ESRS
Materiality 5 – 9	Medium	Not material. Topic not disclosed in sustainability statement. Monitor. Internal and external reporting as required.
Materiality 1 - 4	Low	Not material. Topic not disclosed in sustainability statement.

In determining the likelihood and magnitude of effect, two he established FOCL risk matrix were used:

SEVERITY		Magnitude of Effect Revenue loss / potential financial gain		LIKELIHOOD
Very High	5	6.00%	£2,160,000	Almost certain, it is expected to occur (>50%)
High	4	4.00%	£1,440,000	Likely, there is a strong possibility that it will occur (25-50%)
Moderate	3	2.00%	£720,000	Possible, there is a history of occurrences (5-25%)
Low	2	0.60%	£216,000	Not expected, but it may occur at some time (1-5%)
Very Low	1	0.20%	£72,000	Unlikely, but it may occur exceptionally (0-1%)

Materiality of risks and opportunities is assessed based on the combination of the likelihood of occurrence and potential magnitude of effect (magnitude of effect x likelihood).

The prioritisation of materiality is as follows:'

Materiality 10 – 25	High	Material topic. Disclose requirements (including application requirements) related to that specific sustainability matter in the corresponding topical ESRS
Materiality 5 – 9	Medium	Not material. Topic not disclosed in sustainability statement. Monitor. Internal and external reporting as required.
Materiality 1 - 4	Low	Not material. Topic not disclosed in sustainability statement.



### Decision making process

The 2023 materiality assessment was completed with support from relevant members of the Leadership Team, it is proposed future assessments will be conducted in form of working meeting with the member of the Leadership Team. The CEO will have the final decision on the output prior to the result being presented to The Board of Directors for approval.

### Changes from previous materiality assessment

The materiality assessment for this reporting year has significantly changes compared to previous reports. The main reason for the changes is our move towards completing a double materiality assessment as part of CSRD and ESRS requirements. The structure of the topics and grouping has been done in accordance with ESRS 1 AR 16, resulting in a change to structure, content and terminology. Further the new structure for thresholds have resulted in new topics being included and some of the previous material topics have been removed.

### IRO-2 – Disclosure requirements in ESRS covered by the undertaking’s sustainability statement

Disclosure requirements	Ref.
BP-1 - General basis for preparation of sustainability statements	Basis for <b>preparation</b>
BP-2 - Disclosures in relation to specific circumstances	Basis for <b>preparation</b>
GOV-1 - The role of the administrative, management and supervisory bodies	Governance
GOV-2 - Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	Governance
GOV-3 – Integration of sustainability-related performance in incentive schemes	Governance
GOV-4 – Statement on due diligence	Governance
GOV-5 - Risk management and internal controls over sustainability reporting	Governance
SBM-1 – Strategy, business model and value chain	<p>Risk management is controlled dynamically rather than in a prescribed manner. Policy and processes relevant to key areas of operation are maintained and supported by key decisions being discussed and made by the Leadership team or Board (dependent on gravity of the subject / outcome)</p> <p>The main sustainability related risks identified are specified in ‘1.3 Strategy’ under the section for ‘SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model’.</p> <p><b>Strategy</b></p>



Disclosure requirements	Ref.
SBM-2 – Interest and views of stakeholders	<p>Risk management is controlled dynamically rather than in a prescribed manner. Policy and processes relevant to key areas of operation are maintained and supported by key decisions being discussed and made by the Leadership team or Board (dependent on gravity of the subject / outcome)</p> <p>The main sustainability related risks identified are specified in '1.3 Strategy' under the section for 'SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model'.</p> <p><b>Strategy</b></p>
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	<p>Risk management is controlled dynamically rather than in a prescribed manner. Policy and processes relevant to key areas of operation are maintained and supported by key decisions being discussed and made by the Leadership team or Board (dependent on gravity of the subject / outcome)</p> <p>The main sustainability related risks identified are specified in '1.3 Strategy' under the section for 'SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model'.</p> <p><b>Strategy</b></p>
IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	Impact, risk and opportunity management
IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Impact, risk and opportunity management
MDR-P – Policies adopted to manage material sustainability matters	Impact, risk and opportunity management
MDR-A – Actions and resources in relation to material sustainability matters	Impact, risk and opportunity management
MDR-M – Metrics in relation to material sustainability matters	Metrics and targets
MDR-T - Tracking effectiveness of policies and actions through targets	Metrics and targets
E1-1 – Transition plan for climate change mitigation	E1 General <b>disclosure</b>
E1-2 – Policies related to climate change mitigation and adaptation	E1 Impact, risk and opportunity management



Disclosure requirements	Ref.
E1-3 – Actions and resources in relation to climate change policies	E1 Impact, risk and opportunity management
E1-4 – Targets related to climate change mitigation and adaptation	E1 Metrics and targets
E1-5 – Energy consumption and mix	E1 Metrics and targets
E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	E1 Metrics and targets
E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	E1 Metrics and targets
E2-1 – Policies related to pollution	<p>FOCL is fully committed to protect the environment by complying with all relevant international, national, and local laws and to continuously work to improve our environmental performance. Sustainability matters pertaining to pollution of air and pollution of soil have been assessed to be material to FOCL operations; specifically the impacts, risks and opportunities of air pollution resulting from emissions generated burning fossil fuels for onboard power generation, as well as air effluent from incineration of waste products onboard. The negative impact of pollution to soil which may result from a lack of accountability by Third Party waste management companies to properly and effectively segregate, process and recycle waste wherever possible. The ability to reduce FOCL's impacts of air pollution are presently limited by the technical systems onboard, which are only designed for combustion of certain fuel types. These impacts negatively affect the "silent" stakeholders - the environment, particularly local air quality in the ports that our vessels visit, and the local populations therein affected. Violations of international regulations governing pollution of air, soil or sea could also lead to serious operational and financial implications and reputational damage, thus it is paramount we take every measure available to prevent these under FOCL policy and procedures.</p> <p><b>E2 Impact, risk and opportunity management</b></p>
E2-2 – Actions and resources related to pollution	FOCL is fully committed to protect the environment by complying with all relevant international, national, and local laws and to continuously work to improve our environmental performance. Sustainability



Disclosure requirements	Ref.
	<p>matters pertaining to pollution of air and pollution of soil have been assessed to be material to FOCL operations; specifically the impacts, risks and opportunities of air pollution resulting from emissions generated burning fossil fuels for onboard power generation, as well as air effluent from incineration of waste products onboard. The negative impact of pollution to soil which may result from a lack of accountability by Third Party waste management companies to properly and effectively segregate, process and recycle waste wherever possible. The ability to reduce FOCL's impacts of air pollution are presently limited by the technical systems onboard, which are only designed for combustion of certain fuel types. These impacts negatively affect the "silent" stakeholders - the environment, particularly local air quality in the ports that our vessels visit, and the local populations therein affected. Violations of international regulations governing pollution of air, soil or sea could also lead to serious operational and financial implications and reputational damage, thus it is paramount we take every measure available to prevent these under FOCL policy and procedures.</p> <p><b>E2 Impact, risk and opportunity management</b></p>
<p>E2-3 – Targets related to pollution</p>	<p>International Air Pollution Prevention Certificate (IAPP).</p> <p>FOCL vessel Diesel Generator exhaust stacks have been fitted with Exhaust Gas Cleaning Systems, EGCS, which limit sulphur oxide (SOx) emissions to within strict internationally agreed values. Additionally, the vessels each have an International Energy Efficiency Certificate (IEEC) and follow guidance stipulated in Ship Energy Efficiency Management Plans, SEEMPs, enhancing awareness and best practices around energy consumption and reducing fuel-related emissions. In addition, two vessels utilise incinerators to minimise the necessary garbage offload quantity and eliminate sanitation and safety problems associated with excessive garbage accumulation.</p> <p>Pollution to water:</p>





Disclosure requirements	Ref.
	<p>Presently pollution of water is not considered material to FOCL operations, as discharge to sea of all types of liquid and comminuted semi-solid effluent is strictly regulated in MARPOL Annex I and Annex IV. Each vessel in the FOCL fleet carries an International Sewage Pollution Prevention Certificate, and follows procedures laid out in company Policy concerning wastewater discharges whilst underway at sea. Further, pollution of local ecosystems through transfer and storage of ballast water from one region to another is strictly governed under the Ballast Water Management Convention, promulgated and dictated to designated personnel through the ship-specific Ballast Water Management Plans and confirmed to be compliant through issue and renewal of the International Ballast Water Management Certificate. Accidental pollution of water through emergency incidents is also mitigated through Shipboard Oil Pollution Emergency Plans (SOPEP), which form the basis for frequent oil spill drills onboard.</p> <p>Pollution to soil:</p> <p>As FOCL operates ships at sea, pollution of soil is only considered material as an indirect consequence of mismanagement of FOCL waste through Third-Party waste management companies. To this end, a detailed description of actions and resources has not been provided in this 2023 'FOCL Sustainability Statement'. Any necessary action plans and resources will be considered and deployed ready for future implementation and disclosure.</p> <p><b>E2 Metrics and targets</b></p>
E2-4 – Pollution of air, water and soil	<p>International Air Pollution Prevention Certificate (IAPP).</p> <p>FOCL vessel Diesel Generator exhaust stacks have been fitted with Exhaust Gas Cleaning Systems, EGCS, which limit sulphur oxide (SOx) emissions to within strict internationally agreed values. Additionally, the vessels each have an International Energy Efficiency Certificate (IEEC) and follow guidance stipulated in Ship Energy Efficiency Management Plans, SEEMPs, enhancing awareness and best practices</p>



Disclosure requirements	Ref.
	<p>around energy consumption and reducing fuel-related emissions. In addition, two vessels utilise incinerators to minimise the necessary garbage offload quantity and eliminate sanitation and safety problems associated with excessive garbage accumulation.</p> <p>Pollution to water:</p> <p>Presently pollution of water is not considered material to FOCL operations, as discharge to sea of all types of liquid and comminuted semi-solid effluent is strictly regulated in MARPOL Annex I and Annex IV. Each vessel in the FOCL fleet carries an International Sewage Pollution Prevention Certificate, and follows procedures laid out in company Policy concerning wastewater discharges whilst underway at sea. Further, pollution of local ecosystems through transfer and storage of ballast water from one region to another is strictly governed under the Ballast Water Management Convention, promulgated and dictated to designated personnel through the ship-specific Ballast Water Management Plans and confirmed to be compliant through issue and renewal of the International Ballast Water Management Certificate. Accidental pollution of water through emergency incidents is also mitigated through Shipboard Oil Pollution Emergency Plans (SOPEP), which form the basis for frequent oil spill drills onboard.</p> <p>Pollution to soil:</p> <p>As FOCL operates ships at sea, pollution of soil is only considered material as an indirect consequence of mismanagement of FOCL waste through Third-Party waste management companies. To this end, a detailed description of actions and resources has not been provided in this 2023 'FOCL Sustainability Statement'. Any necessary action plans and resources will be considered and deployed ready for future implementation and disclosure.</p> <p><b>E2 Metrics and targets</b></p>
E2-6 – Anticipated financial effects from pollution-related impacts, risks and opportunities	<p>International Air Pollution Prevention Certificate (IAPP).</p> <p>FOCL vessel Diesel Generator exhaust stacks have been fitted with Exhaust Gas Cleaning</p>



Disclosure requirements	Ref.
	<p>Systems, EGCS, which limit sulphur oxide (SOx) emissions to within strict internationally agreed values. Additionally, the vessels each have an International Energy Efficiency Certificate (IEEC) and follow guidance stipulated in Ship Energy Efficiency Management Plans, SEEMPs, enhancing awareness and best practices around energy consumption and reducing fuel-related emissions. In addition, two vessels utilise incinerators to minimise the necessary garbage offload quantity and eliminate sanitation and safety problems associated with excessive garbage accumulation.</p> <p>Pollution to water:</p> <p>Presently pollution of water is not considered material to FOCL operations, as discharge to sea of all types of liquid and comminuted semi-solid effluent is strictly regulated in MARPOL Annex I and Annex IV. Each vessel in the FOCL fleet carries an International Sewage Pollution Prevention Certificate, and follows procedures laid out in company Policy concerning wastewater discharges whilst underway at sea. Further, pollution of local ecosystems through transfer and storage of ballast water from one region to another is strictly governed under the Ballast Water Management Convention, promulgated and dictated to designated personnel through the ship-specific Ballast Water Management Plans and confirmed to be compliant through issue and renewal of the International Ballast Water Management Certificate. Accidental pollution of water through emergency incidents is also mitigated through Shipboard Oil Pollution Emergency Plans (SOPEP), which form the basis for frequent oil spill drills onboard.</p> <p>Pollution to soil:</p> <p>As FOCL operates ships at sea, pollution of soil is only considered material as an indirect consequence of mismanagement of FOCL waste through Third-Party waste management companies. To this end, a detailed description of actions and resources has not been provided in this 2023 'FOCL Sustainability Statement'. Any necessary action plans and resources will be</p>



Disclosure requirements	Ref.
	considered and deployed ready for future implementation and disclosure.  <b>E2 Metrics and targets</b>
E5-1 – Policies related to resources use and circular economy	E5 Impact, risk and opportunity management
E5-2 – Actions and resources in relation to resource use and circular economy	E5 Impact, risk and opportunity management
E5-3 - Targets related to resource use and circular economy	E5 Impact, risk and opportunity management
E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities	E5 Impact, risk and opportunity management
S1-1 – Policies related to own workforce	S1 Impact, risk and opportunity management
S1-2 – Processes for engaging with own workers and workers' representatives about impacts	S1 Impact, risk and opportunity management
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	S1 Impact, risk and opportunity management
S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1 Impact, risk and opportunity management
S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1 Metrics and targets
S1-6 - Characteristics of the undertaking's employees	S1 Metrics and targets
S1-7 – Characteristics of non-employee workers in the undertaking's own workforce	S1 Metrics and targets
S1-9 – Diversity metrics	S1 Metrics and targets
S1-10 – Adequate wages	S1 Metrics and targets
S1-13 – Training and skills development metrics	S1 Metrics and targets
S1-14 – Health and safety metrics	S1 Metrics and targets
S1-16 - Compensation metrics (pay gap and total compensation)	S1 Metrics and targets
S1-17 – Incidents, complaints and severe human rights impacts	S1 Metrics and targets
G1-1 – Corporate culture and business conduct policies	G1 Impact, risk and opportunity <b>management</b>
G1-3 – Prevention and detection of corruption or bribery	G1 Impact, risk and opportunity <b>management</b>



Disclosure requirements	Ref.
G1-4 – Confirmed incidents of corruption or bribery	G1 Metrics and targets

#### MDR-P – Policies adopted to manage material sustainability matters

When reporting on policies for the material topics FOCL will follow the requirements as described in ESRS 2 ‘MDR-P – Policies adopted to manage material matters’. FOCL will publish a Sustainability Policy with the objective to manage material impacts, risks and opportunities identified in the materiality assessment. Further, the material topics are also covered in other policies as well. Current FOCL policies are:

Onboard	Shoreside
Climate Change Policy <i>(to be developed)</i>	
Sustainability Policy <i>(to be developed)</i>	
QLTY P 09 Ethics Policy	Equality, Diversity & Inclusion Policy
QLTY P 12 Code of Conduct	Anti Bullying & Harassment Policy
QLTY P 13 Accident Prevention Policy	Health and Safety Policy
ENV 01 Garbage and Waste (content)	

#### MDR-A – Actions and resources in relation to material sustainability matters

When reporting on policies for the material topics FOCL will follow the requirements as described in ESRS 2 ‘MDR-A – Actions and resources in relation to material sustainability matters’. Under each material topics a list of key actions to be taken in the reporting year is included. Planned actions for the future and their expected outcomes are included where implemented. Where this is still being established it is reported accordingly.

### 1.5 Metrics and targets

#### MDR-M – Metrics in relation to material sustainability matters

When reporting on policies for the material topics FOCL follow the requirements as described in ESRS 2 ‘MDR-M – Metrics in relation to material sustainability matters’. FOCL have disclosed metrics required from the topical ESRS where found material, and if material added company specific metrics. The disclosures includes methodologies and significant assumptions behind the metrics, unit of measure and it is labelled with a precise name and description. None of the metrics provided in the reporting year has been verified by an external body. For the relevant metrics this will be specified in the future reporting when and if they are verified.

#### MDR-T - Tracking effectiveness of policies and actions through targets

When reporting on policies for the material topics FOCL follow the requirements as described in ESRS 2 ‘MDR-T - Tracking effectiveness of policies and actions through targets’. The targets are linked to the policies objective. On some of the areas FOCL does not have a baseline. This is described where relevant. In the description of targets it is described whether and how stakeholders are involved. Where provided targets described in this report are new and progress is therefore not available for the reporting year.

## 2. Environmental information

### 2.1 EU Taxonomy

#### Background

EU Taxonomy is a system of classification that establishes clear and consistent criteria for determining if economic activities are sustainable. It utilises science-based technical screening criteria that must be met for an activity to be considered ‘green’.



### Assessment of activity

The choice of the activities for FOCL is '6.11 Sea and coastal passenger water transport', defined as: *Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for performing passenger transport, on sea or coastal waters, whether scheduled or not. The economic activities in this category include operation of ferries, water taxis and excursions, cruise or sightseeing boats.*

### EU Taxonomy score

To assess our activities' eligibility and alignment, we have used Celsia's taxonomy software solution. 'Eligible' means that the company substantially contributes to one of the six environmental objectives of the taxonomy. To be 'Aligned', the company must meet two additional criteria:

- Do-No-Significant-Harm (DNSH) in relation to the other environmental objectives
- Comply with Minimum Social Safeguards as described in the taxonomy regulations

FOCL turnover is 85% 'eligible', however, due to Balmoral being exempt from EEDI requirements she does not have a required EEDI value resulting in a taxonomy score that is not aligned.

A voluntary EEDI value for Balmoral is being considered for 2024. If this value is 10% below the EEDI requirement applicable on 1 April 2022 our alignment to the EU Taxonomy scheme will change accordingly.

## **2.2 (ESRS E1) Climate change**

### **2.2.1 E1 General disclosure**

There are no incentive schemes currently in place relevant to sustainability management or performance.

The below information is a summary table taken from [IPCC Climate Change 2021 report](#) detailing a climate risk assessment and overview of the SSPs (Shared Socio-economic Pathways) generated by the Intergovernmental Panel on Climate Change (IPCC) Summary for Policymakers 2021:

Scenario	Near term, 2021 - 2040		Mid-term, 2041-2060		Long term, 2081-2100	
	Best estimate (°C)	Very likely range (°C)	Best estimate (°C)	Very likely range (°C)	Best estimate (°C)	Very likely range (°C)
SSP1-1.9	1,5	1,2 to 1,7	1,6	1,2 to 2,0	1,4	1,0 to 1,8
SSP1-2.6	1,5	1,2 to 1,8	1,7	1,3 to 2,2	1,8	1,3 to 2,4
SSP2-4.5	1,5	1,2 to 1,8	2,0	1,6 to 2,5	2,7	2,1 to 3,5
SSP3-7.0	1,5	1,2 to 1,8	2,1	1,7 to 2,6	3,6	2,8 to 4,6
SSP5-8.5	1,6	1,3 to 1,9	2,4	1,9 to 3,0	4,4	3,3 to 5,7

SSP1 – Sustainable	SSP3 – Regional rivalry
SSP2 – Middle of the road	SSP5 – Fossil-fuelled development

When considering how the different SSPs influence the risk picture, it is necessary to take the characteristics of our assets into account. We will continue to comply with rules and regulations relevant to our industry via our continued engagement with Flag and Class.

At this stage we are not able to confidently project or predict how changes to climate will influence our operation from a service provider perspective, however it is understood that changes in ecosystems,



societal structures and political boundaries will have an impact on the maritime travel and tourism industry.

However, climate change may have limited direct consequences on our assets:

- Continued development of engine management systems and fuel optimisation
- A drive towards green fuel technology in line with IMO requirements
- A change of itinerary planning
  - Availability of infrastructure
  - Change to geographical desirability guest
  - Local / national environmental policy restrictions

Further detailed analysis and a company specific climate risk assessment is required to further understand and document the short-, medium- and long-term effects for FOCL

Reference is made to paragraph '1.4 Impact, risk and opportunity management' for overall description of the process to identify impacts, risks and opportunity.

#### E1-1 – Transition plan for climate change mitigation

FOCL have not implemented a transition plan in accordance with disclosure requirement E1-1. This will be included in future sustainability statements.

### 2.2.2 E1 Impact, risk and opportunity management

#### E1-2 – Policies related to climate change mitigation and adaptation

Policies to manage material impacts, risks and opportunities related to climate mitigation are to be developed and published during 2024

FOCL's CEO will be the owner of all related policies.

#### E1-3 – Actions and resources in relation to climate change policies

A detailed description of actions has not been provided in this 'FOCL Sustainability Statement 2023'. Action plans will be developed during 2024 and reported accordingly.

### 2.2.3 E1 Metrics and targets

#### E1-4 – Targets related to climate change mitigation and adaptation

In 2023, FOCL implemented a refined Data Collection System to track fuel consumption and establish a GHG emissions baseline as part of EU & UK MRV. This baseline provides the reference point from which future targets relating to climate change mitigation can be effectively set and measured. The following table defines FOCL's initial targets related to climate change:

Short term (2024)	Medium term (2-5 years)	Long Term (>5 years)
Requirement to reduce GHG emissions 2% annually	Reduce and monitor GHG emissions to ensure 2% annual decrease	CO2 neutral by 2050

#### E1-5 – Energy consumption and mix

The majority of energy consumption takes place onboard our vessels, our fleet operate on fossil fuel. Although shore power connections are installed onboard the vessel FOCL have not been operating in ports where this option could be used.

Energy consumption and mix	2023 (MWh)	Share of total (%)
Fuel consumption from coal and coal products	0	0
Fuel consumption from crude oil and petroleum (vessels)	716,677.53	99.8
Fuel consumption from natural gas	0	0



Fuel consumption from other fossil sources	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (vessels)	1215.33	0.2
<b>Total fossil energy consumption</b>	<b>717892.86</b>	
Consumption from nuclear sources	0	0
Fuel consumption for renewable sources, including biomass	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	1303.06	94.92
Consumption of self-generated non-fuel renewable energy	69.81	5.08
<b>Total renewable and low carbon energy consumption</b>	<b>1372.87</b>	<b>0.22</b>
<b>Total energy consumption</b>	<b>719265.73</b>	<b>0.19</b>

For the section 'Fuel consumption from crude oil and petroleum' this is FOCL's use of HFO, VLSFO and MGO which has been converted from tonnes of fuel to joule and then megawatt hours (MWh).

The purchased electricity and heat represents the energy consumption in the FOCL office and from the ships when connected to shore power. Percentages of fossil sources and renewable energy have been calculated using the energy mix as provided by international energy agency ([IEA](#)) on energy mixes.

#### E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

Emission Type	Activity data	Total	* GHG Conversion Factor Fuel EU Maritime (to 3 decimal places)	tCO <sub>2</sub> e	Remark
<b>Scope 1</b> Emissions are "direct emissions" from sources that are owned or controlled by the company					
Fuel	Liquid Fuel HFO	1311.89 mt	3.114	~4085	14,760 kWh
	Liquid Fuel VLSFO	43193.07 mt	3.151	~136,101	491,960 kWh
	Liquid Fuel MGO	17699.89 mt	3.206	~56,745	209,957 kWh
			<b>GHG Conversion Factor DEFRA 2023 (to 2 decimal places)</b>		
Company cars	Business miles	166,588 miles	0.27	~45	
Claimed business mileage (Employee own car)		23,023 miles	0.27	~6	
<b>Scope 2</b> Emissions are the "indirect emissions" released into the atmosphere from the use of purchased energy					
Consumption of electricity Head Office	Renewable source	314,078 kWh	0.21	~65	
	Self-generated	69,809 kWh	0.21	~15	
Indirect emissions Fleet shore power	Purchased electricity (Fleet)	2,058,573 kWh	0.21	~426	Braemar - layup
		75,960 kWh	0.21	~16	Bolette
		69,779 kWh	0.21	~14	Borealis
<b>Scope 3</b> Emissions include all other "indirect emissions" that occur across the value chain and are outside of the organisation's direct control					
Fuel - Well to Tank	Liquid Fuel HFO	1311.89 mt	* 3.114	~165	Total consumption x conversion factor x lower calorific value
	Liquid Fuel VLSFO	43193.07 mt	* 3.151	~5580	
	Liquid Fuel MGO	17699.89 mt	* 3.206	~2423	
Commercial Refuse (Ipswich)	Combustible	6.85 mt	21.28	~146	
	Recycled	3.16 mt	21.28	~67	
	Landfill	0.53 mt	520.34	~276	
	Combustible	1.84 mt	21.28	~39	





Dry Mixed recycling (Ipswich)	Recycled	5.15 mt	21.28	~110	
	Landfill	0.37 mt	8.88	~3	
Water (Ipswich)	Supply	613.14 m3	0.18	~0.11	
	Treatment	571.39 m3	0.20	~0.11	
Waste generated in operations (Fleet)	Plastic	838.9 m3	21.28	~671	
	Food waste	428 m3			
	Domestic waste	6675 m3			
	Cooking oil	34 m3			
	Electrical waste	112.1 m3	520.34		
	Operational waste	959 m3			
	Incinerator ash	27.8 m3			9.85
Water (Fleet)	Supply	58344 m3	0.18	~10	
	Treatment	1355 m3	0.20	~0.27	
Purchased goods (Hotel)	Class III	19471 miles	0.41	~8	
	HGV's	66227 m	1.47	~97	
	HGV's (Reefer)	51981 miles	1.70	~88	
Purchased goods (Technical)	-		-	-	Information unavailable for 2023
Business travel / Flights	Domestic	11,983 km	0.27	~3	Information provided by Bahia Manning Agent in conjunction with ATPL
	Short	204,283 km	0.19	~38	
	Long	27,153,157 km	0.18	~4,774	
	Short	2,012,510 km	0.19	~374	Information provided by Fred. Olsen Business Travel
	Long	29,569,392 km	0.18	~5,198	

Calculation method:

### Scope 1

Total fuel consumption (by fuel type) x GHG conversion factor

Total business miles x GHG conversion factor

### Scope 2

Total purchased electricity (office / vessels) x GHG conversion factor

### Scope 3

Fuel (well to tank) – total purchased ships fuel x GHG conversion factor x lower calorific value (by fuel type)

Waste – total waste x GHG conversion factor (by waste type)

Water – total consumption x GHG conversion factor

Purchased Goods – total delivery miles x GHG conversion factor (by vehicle type)

Business flight miles – total miles x GHG conversion factor (by flight type)

### E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

The financial effects have not yet been calculated. Response to the disclosure requirements will be included in the sustainability statement for 2024.



## 2.3 (ESRS E2) Pollution

### 2.3.1 E2 General disclosure

FOCL is fully committed to protect the environment by complying with all relevant international, national, and local laws and to continuously work to improve our environmental performance. Sustainability matters pertaining to pollution of air and pollution of soil have been assessed to be material to FOCL operations; specifically the impacts, risks and opportunities of air pollution resulting from emissions generated burning fossil fuels for onboard power generation, as well as air effluent from incineration of waste products onboard. The negative impact of pollution to soil which may result from a lack of accountability by Third Party waste management companies to properly and effectively segregate, process and recycle waste wherever possible. The ability to reduce FOCL's impacts of air pollution are presently limited by the technical systems onboard, which are only designed for combustion of certain fuel types. These impacts negatively affect the "silent" stakeholders - the environment, particularly local air quality in the ports that our vessels visit, and the local populations therein affected. Violations of international regulations governing pollution of air, soil or sea could also lead to serious operational and financial implications and reputational damage, thus it is paramount we take every measure available to prevent these under FOCL policy and procedures.

### 2.3.2 E2 Impact, risk and opportunity management

#### E2-1 – Policies related to pollution

Policies relating to pollution prevention and emission control are developed around international laws and regulations and are described in the Environmental section of FOCL SQM Policy. Relevant extracts of the policy are detailed below:

*'Fred. Olsen Cruise Lines Staff and Crew... will respect the environment in which we operate and seek to minimise so far as we reasonably can the impact of our activities on the environment.'*

*'FOCL recognises that improved energy efficiency will make a valuable contribution to reducing global carbon emissions, while at the same time reducing costs by reducing fuel consumption.'*

The scope of the policy related to pollution is focused on our ship's emissions generated inherently in the day-to-day operation and management of cruise vessels as assessed to be material. The objective of the policy is to limit operational effluents where possible, regulate the circumstances deemed suitable for discharge and prevent negative impacts and pollution incidents.

#### E2-2 – Actions and resources related to pollution

Pollution to air:

FOCL vessels maintain strict compliance with by international maritime regulations, specifically the relevant sections of MARPOL Annex I and MARPOL Annex VI which address oil pollution and air pollution. By MARPOL, the ship is required to have and maintain a Record Book for Fuel Oil (an Oil Record Book, recording all fuel consumption quantities) and Ozone Depleting Substances. All FOCL ships have been issued with an International Oil Pollution Prevention Certificate (IOPP) and an International Air Pollution Prevention Certificate (IAPP).

FOCL vessel Diesel Generator exhaust stacks have been fitted with Exhaust Gas Cleaning Systems, EGCS, which limit sulphur oxide (SOx) emissions to within strict internationally agreed values. Additionally, the vessels each have an International Energy Efficiency Certificate (IEEC) and follow guidance stipulated in Ship Energy Efficiency Management Plans, SEEMPs, enhancing awareness and best practices around energy consumption and reducing fuel-related emissions. In addition, two vessels utilise incinerators to minimise the necessary garbage offload quantity and eliminate sanitation and safety problems associated with excessive garbage accumulation.

Pollution to water:

Presently pollution of water is not considered material to FOCL operations, as discharge to sea of all types of liquid and comminuted semi-solid effluent is strictly regulated in MARPOL Annex I and Annex IV. Each vessel in the FOCL fleet carries an International Sewage Pollution Prevention Certificate, and follows



procedures laid out in company Policy concerning wastewater discharges whilst underway at sea. Further, pollution of local ecosystems through transfer and storage of ballast water from one region to another is strictly governed under the Ballast Water Management Convention, promulgated and dictated to designated personnel through the ship-specific Ballast Water Management Plans and confirmed to be compliant through issue and renewal of the International Ballast Water Management Certificate. Accidental pollution of water through emergency incidents is also mitigated through Shipboard Oil Pollution Emergency Plans (SOPEP), which form the basis for frequent oil spill drills onboard.

Pollution to soil:

As FOCL operates ships at sea, pollution of soil is only considered material as an indirect consequence of mismanagement of FOCL waste through Third-Party waste management companies. To this end, a detailed description of actions and resources has not been provided in this 2023 'FOCL Sustainability Statement'. Any necessary action plans and resources will be considered and deployed ready for future implementation and disclosure.

### 2.3.3 E2 Metrics and targets

#### E2-3 – Targets related to pollution

Based on the assessed materiality of air pollution in FOCL operations in 2023, the following targets are among those being considered for short-, medium- and long-term development:

Short term (2024)	Medium term (2-5 years)	Long Term (>5 years)
Establish emission baseline and target	TBD	TBD
Compliance with IMO Strategy on reduction of GHG emissions from ships.	TBD	20% reduction in emissions by 2030

With regards to pollution of water and soil, FOCL has the absolute target of preventing all forms of hazardous or polluting by-products of our operations from affecting the lithosphere or hydrosphere. In the coming years, FOCL seeks to gain a comprehensive understanding of every viable area of improvement, by technological or operational means, to limit our material impact on our oceans. To this end, 2023 will be utilised as a baseline for future comparison and development. Future targets will relate to reducing effluent quantity and composition increasingly below thresholds regulated by international standards. In 2024, FOCL will begin to understand the scope of soil pollution that may be attributed to our operations. This understanding is essential to making informed decisions about which ports and with which companies we entrust our waste, and how this may affect the surrounding ecosystems and communities, to prevent pollution of soil and reduce our environmental impact.

All targets for 2023 are structured around FOCL's own operations, as our understanding of the scale of our environmental impact is still being compiled.

#### E2-4 – Pollution of air, water and soil

In January 2024, the [EU's Emissions Trading System](#) (EU ETS) will be extended to cover CO2 emissions from all large ships (of 5 000 gross tonnage and above) entering EU ports, regardless of the flag they fly.

The system covers:

- 50% of emissions from voyages starting or ending outside of the EU (allowing the third country to decide on appropriate action for the remaining share of emissions);
- 100% of emissions that occur between two EU ports and when ships are within EU ports.

The EU ETS covers CO2 (carbon dioxide), CH4 (methane) and N2O (nitrous oxide) emissions, but the two latter only as from 2026.

Emissions from maritime transport are included in the overall ETS cap, which defines the maximum amount of greenhouse gases that can be emitted under the system. The cap is reduced over time to ensure that



all ETS sectors contribute to the EU's climate objectives. This will incentivise energy efficiency, low-carbon solutions, and reductions of the price difference between alternative fuels and traditional maritime fuels. The system builds on the provisions in place for other EU ETS sectors, as well as the recently revised EU Monitoring, Reporting and Verification Regulation for maritime transport ('MRV Maritime Regulation').

In practice, FOCL will have to purchase and surrender (use) EU ETS emission allowances for each tonne of reported CO<sub>2</sub> (or CO<sub>2</sub> equivalent) emissions in the scope of the EU ETS system. It is the role of administering authorities of EU Member States to ensure compliance using similar rules as for the other ETS sectors.

To ensure a smooth transition, FOCL will only have to surrender allowances for a portion of their emissions during an initial phase-in period:

- 2025: for 40% of their emissions reported in 2024;
- 2026: for 70% of their emissions reported in 2025;
- 2027 onwards: for 100% of their reported emissions.

A reporting and review clause is included to monitor the implementation of the rules applicable to the maritime sector and to take into account relevant developments in the International Maritime Organisation (IMO).

## E2-6 – Anticipated financial effects from pollution-related impacts, risks and opportunities

The financial effects of direct pollution-related impacts have not been calculated or included in this '2023 Sustainability Statement'. FOCL obligations to partake in EU ETS in 2024 has enhanced awareness and monitoring of the emissions resulting from fuel consumption, and has made it possible to quantify the financial implications of remaining with present technical systems and energy sources in the future.

Further information on the financial effects pertaining to the disclosure requirements will be included in the sustainability statement for 2024.

## 2.4 (ESRS E5) Circular Economy

### 2.4.1 E5 General disclosure

FOCL has identified several impacts, risks and opportunities in our waste stream management operations, considering the financial risks to be material and impacts presently immaterial. All material impacts, risks and opportunity are listed in 1.3 Strategy – (SBM-3) and 1.4 Impacts, risks and opportunities further details the process of identifying and assessing the material topics. The identified risks result from inadequate waste minimisation and inefficient waste processing and offload planning, as uncontrolled bulk domestic waste generation can be prevented at source, whether by purchasing products with reduced packaging or utilising less resources in excess of demand, such as food waste.

Enhancing a continuous culture shift in crew towards conscientious decisions surrounding waste minimisation will naturally have a knock-on effect on waste organisation and processing, particularly with regards to materials that generate hazardous waste, where treatment strategies are limited and, in most cases, storage and offload is the only solution. Overall waste accountability poses a challenge as FOCL waste is routinely delivered to reception facilities in ports around the world. This matter is being addressed through improving professional connections and understanding between FOCL and the Third Party waste management providers in each port.

Impacts and risks relating to resource inflow are not deemed material to FOCL.

### 2.4.2 E5 Impact, risk and opportunity management

#### E5-1 – Policies related to resources use and circular economy

Policies specifically relating to FOCL's commitment to apply a Circular Economy approach in managing resource inflow and outflow were not published in the company's Safety & Quality Management system in 2023, as the impacts, risks and opportunities have so far been considered immaterial to FOCL operations.



Policies addressing the impacts of waste stream management are currently included in the Environmental section of FOCL SQM Policy. The relevant part of the policy is extracted below:

*'Fred. Olsen Cruise Lines Staff and Crew... will respect the environment in which we operate and seek to minimise so far as we reasonably can the impact of our activities on the environment.'*

*'FOCL policy is to reduce waste generated on board to a minimum, thus minimizing the impact on the environment. Such reduction will have to be considered in all parts of operation.'*

*'Reduction in creation of garbage as well as re-use and recycling shall be focus areas.'*

The scope of the policy at present relates to measures for minimising and managing waste operations onboard, in line with the identified risks and opportunities as assessed. The key objectives of the policies are waste minimisation and waste stream organisation, to reduce as far as practicable, the negative impacts of our vessels' operations.

#### E5-2 – Actions and resources in relation to resource use and circular economy

The vessels comply with all relevant sections of MARPOL Annex V and the Polar Code, as well as detailed company-issued Garbage Management Plans which guide crewmembers on waste segregation, collection, transportation, processing, storing and discharge. Designated personnel are also delegated responsibility for keeping records of all waste offload operations in the ship's Garbage Record Book.

#### E5-3 - Targets related to resource use and circular economy

Detailed numerical targets and objectives have not been (provided in this 'FOCL Sustainability Statement 2023'. Greater focus and investigation into onboard waste stream management will allow these targets to be developed this year and implemented in the version covering 2024. Below find identified short-, medium- and long-term action points to assist in formulating targets:

Short term (2024)	Medium term (2-5 years)	Long Term (>5 years)
Identify immediate sources of excess waste and formulate strategies & targets	Reduce onboard waste generation by 10-20% (aspirational)	CO2 neutral by 2050
Port Reception Facility research and visits in all UK ports to harmonize and optimise waste offloads	Prioritisation of third-party waste management companies with lower emissions and environmental impacts	Generate circular economy in various waste streams

#### E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities

As previously stated in 'Section 2.4.1 E5 General Disclosure', challenges pertaining to the mitigation of waste stream risks and development of strategies exploiting opportunities exist due to the global network of Third-Party waste management companies, many of whom are pre-selected and contracted by port authorities or agents as sole provider of services in the designated port. As a result, ongoing waste stream management is largely determined by itinerary planning and port selection. In 2023, a feedback loop regarding the optimisation of circular economy through feedback in determining port selection has not been established, however this has been identified by FOCL as a future consideration.

Therefore, as waste offload is an inevitable consequence of waste generation, focus on waste minimisation may be the most immediately effective means of reducing material impact or financial risk.



### 3. Social information

#### 3.1 (ESRS S1) Own workforce

##### 3.1.1 S1 General disclosure

FOCL have identified actual and potential negative impact related to health and safety issues while working onboard our vessels as a material impact, secure employment and training and skill development are highlighted as financially material.

While other areas of ESRS E1 are relevant to our onboard operations, at this point we consider current processes and working practices are sufficient to reduce the risk to an acceptable level.

Skilled and well-trained crew are a key resource FOCL are dependent on, both from a regulatory and service provisions perspective, as such we place a high degree of focus on both areas.

##### 3.1.2 S1 Impact, risk and opportunity management

###### S1-1 – Policies related to own workforce

Policies to manage impacts related to FOCL's own workforce as well as associated material risks and opportunities are described in the FOCL's SQM, key areas relating to crew are location in;

Human Resources (Crew management / Singapore FOCL Pte Limited /

01. Policy and Documentation / Primary Policy

###### S1-2 – Processes for engaging with own workers and workers' representatives about impacts

When identifying impacts, risks and opportunities related to own workforce, input is taken from engagement with FOCL's own workforce. We have various means of engagement with our workforce. Some key means of engagement are:

- EVERS Suggestion reporting – mechanism that allows crew the opportunity to raise a formal report on any specific subject
- Monthly accident / incident safety statistics and lessons learned
- Safety/Security/Environmental Alerts – specific to a key event
- Periodic Crew surveys – conducted to assess crew opinions on safety culture, safety training, onboard facilities and 'overall crew satisfaction'
- Periodic Staff surveys – conducted to assess shorebased staff opinions on the work environment, positive/negative experiences, suggested improvements and help to foster a positive, engaging, and productive work environment within FOCL
- Monthly onboard CHES Meetings – formal meeting with departmental representatives to discuss, Crew, Health, Environmental, Safety and Security items
- Crew Welfare meetings to discuss crew events and concerns relating to onboard facilities.
- Career Development Plan – a tool to help measure a highlighted development area for a crewmember.
- Appraisal form – a structures process for reviewing the performance of crew as part of their sign-on / sign-off process.

###### S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

If any actual negative impact are identified this shall be properly handled. FOCL's workforce can raise concerns via one of the following systems, dependent on the situation:

Speak Up (Whistleblowing) Policy: Fred. Olsen recognises the importance of a "speak up" culture in which workers feel comfortable raising questions or concerns about anything including potentially unethical, unsafe or even illegal conduct.

The aims of this policy are:



- To encourage colleagues to report suspected wrongdoing as soon as possible, safe in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected, if requested.
- To provide workers with guidance as to how to raise those concerns.
- To reassure workers that they should be able to raise concerns without fear of reprisals, even if they turn out to be mistaken.

Onboard complaints procedure: The Company's Complaints Procedure policy is written to the standards set out by MLC2006 and The Bahamas Maritime Authority. The policy is designed to ensure that all seafarers working for the company are provided with a clear complaints procedure that they are able to utilize if they have a problem or issue. The Company recognizes that Seafarers have the basic right to be respected and treated in a fair and just manner at all times by superiors and fellow crewmembers. The seafarer may contact the Director of Labour directly, for guidance should they feel they are unable to approach the Master, Head of Crewing, to submit their complaint/grievance and/or considers that he/she will be victimised due to presenting a complaint. The details of who are The Bahamas contact is The Director of Labour, c/o The Bahamas Maritime Authority, Shirlaw Street, P.O Box N-4679, Nassau, Bahamas, email: [stcw@bahamasmaritime.com](mailto:stcw@bahamasmaritime.com)

Alternatively, the seafarer may also prefer to contact their national administration. The contact details of the national administrations can be found listed in CRW G 06.01.01 National Administration – MLC Compliance

Designated Person Ashore (DPA): The DPA is an established communication channel between the seafarers and the onshore management on matters related to safety and the environment.

EVERS reporting system: The EVERS reporting system is a system where health, safety, environmental, and compliance incidents and/deviation shall be reported. The person reporting the incident shall recommend mitigating and preventing actions. These shall be assessed by the relevant 'responsible person' and HSSEQ representative to establish the final action in the reporting system and assign responsible person.

NOTE: Due to the confidentiality issues the reporting system is only shared with key onboard and shoreside personal.

#### S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Crew health and safety issues are highlighted via Crew accident (EVERS) reports, each report highlights an immediate and underlying root cause with reasoning for the selected root cause. Based in this double assessment proposed plans to prevent re-occurrence are provided and subsequently approved by the Company Safety and Security Manager.

Monthly analysis is provided to the fleet to highlight areas of concerns and emerging trends with a view to empowering the onboard senior management team to be aware of and remediate know issues.

Key aspects of mitigating risk are:

- A 'no blame' reporting culture
- A robust reporting / investigation process
- A willingness to highlight events with a view to learning from past events
- Transparent analysis reporting
- Onboard engagement structure that allows for senior management teams and crew to discuss events
- A willingness to review SQM content relevant to an EVERS report

The above listed actions comes in addition to all actions integrated as part of the vessels certified safety management system (SMS) and the companies integrated management system. FOCL have a HSSEQ (Health, Safety, Security, Environment and Quality Department that is dedicated to continuously manage our material impact related to health and safety.



### 3.1.3 S1 Metrics and targets

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

FOCL’s targets related to own workforce:

Short term (2024)	Medium term (2-5 years)	Long Term (>5 years)
Agreed accident rates to be determined by Qtr. 3 2024		
Retention rate >92% Marine crew	Retention rate >94% Marine crew	Retention rate >95% Marine crew
Set retention rate targets for shoreside employment	TBA	TBA
Zero bullying and harassment incidents	Zero bullying and harassment incidents	Zero bullying and harassment incidents
All whistleblowing cases handled in accordance with procedure	All whistleblowing cases handled in accordance with procedure	All whistleblowing cases handled in accordance with procedure
Zero human rights violations.	Zero human rights violations.	Zero human rights violations.

Targets are to be established and approved by the Shoreside Leadership Team with the DPA taking the lead role. Targets will be directly links to relevant SQM / Company policies.

#### S1-6 - Characteristics of the undertaking’s employees

FOCL employees consists of employees located in the UK head office and ‘crew’ assigned to our ships. While our crew are employed Manning Partners, for the purpose of this report we classify these persons as FOCL employees.

Breakdown by gender:

Gender	Number of employees	
	Onboard	Shoreside
Female	680 (20.43%)	150 (71%)
Male	2649 (79.57%)	60 (29%)
Other	0	0
<b>Total</b>	<b>3329</b>	<b>210</b>

Breakdown by country:

Country	Number of employees	
	Onboard	Shoreside
Nationalities	49	Full data not available

By contact type, broken down by gender (shoreside head count)

2023				
Female	Male	Other	Not disclosed	Total





Number of employees				
150	60	0	0	210
Number of permanent employees				
146	48	0	0	194
Number of temporary employees				
4	2	0	0	6
Number of non-guaranteed hours employees				
0	2	0	0	2
Number of full-time employees				
111	55	0	0	166
Number of part-time employees				
39	1	0	0	40

Employee turnover rate	17.35 %
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The number above is provided using headcount, as of end of reporting period.

A full breakdown for onboard crew will be provided in the 2024 report.

#### S1-7 – Characteristics of non-employee workers in the undertaking’s own workforce

Type of contract	Number	Offshore/onshore
Consultants	0	
Seconded from another Fred. Olsen Company	0	
Total	0	

The number above is provided using headcount, as of end of reporting period.

#### S1-9 – Diversity metrics

In preparing the disclosure on gender at top management, the undertaking shall use the definition of top management as one and two levels below the administrative and supervisory bodies

Gender diversity at top management (shoreside)

	Female		Male	
	Percent (%)	Number	Percent (%)	Number
Senior Management	29%	4	71%	10
Middle Management	65%	24	35%	13
Employees	77%	122	23%	37

Employees break down by age group:

Age group	Number of employees (head count)	Percent (%)
<30	68	32%



30 – 50	109	52%
>50	33	16%

#### S1-10 – Adequate wages

Information not provided for the 2023 report

#### S1-13 – Training and skills development metrics

Onboard training requirements for crew are specific to the role or rank of the individual crewmember, with a caveat that cross-training can be completed to allow for movement from one area of operation to another. From a regulatory perspective crew must be certificated relevant to their onboard rank.

Shoreside training requirements are either generic for all employees (e.g. cyber security, sexual harassment, whistleblowing...) or specific to an individual's needs. Dependant on the type of training required this will be instigated and Company or manager level.

No data is provided for 2023 as required under disclosure requirement S1-13 (83 (a) and (b) in the reporting year. This will be included in the next statement.

#### S1-14 – Health and safety metrics

The vessels safety management system (SQM) and the integrated company HR Management System (Orbit) covers 100% of FOCL's workforce, this includes both onboard and shoreside employees.

All onboard operations are governed by policies and procedures published in the Companies SQM, this is in line with International Safety Management (ISM) requirements.

Shoreside Metric	Reporting period (2023)	2022
Fatalities	0	0
Total recordable incidents (TRI)	0	0
Total recordable incident frequency rate (TRIF)	0	0
Number of work related illness (employees)	0	0
Lost days to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health (employees)	0	0

Onboard Metric	Reporting period (2023)	2022
Fatalities	0	0
Total recordable incidents (TRI)	212	203
Total recordable incident frequency rate (TRIF)	4.89	5.47
Number of work related illness (employees)	Information not provided	
Lost days to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health (employees)	2357.5	2679.5

#### S1-16 - Compensation metrics (pay gap and total compensation)



When compiling the information required under paragraph 97 (a) for the gap in pay between female and male employees, FOCL used the methodology described in 'ESRS S1 Own Workforce', AR 100:

$$\frac{\text{Average gross hourly pay of male employees} - \text{average gross hourly pay level of female employees}}{\text{Average gross hourly pay level of male employees}}$$

When compiling the information required under paragraph 97 (b) for the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual, FOCL used the methodology described in 'ESRS S1 Own Workforce', AR 103:

$$\frac{\text{Annual total remuneration for the undertaking's highest paid individual}}{\text{Median employee annual total remuneration (excluding the highest – paid individual)}}$$

<b>Gender pay gap</b>	£ 8.60
<b>Total remuneration Ratio</b>	10.42 : 1



### S1-17 – Incidents, complaints and severe human rights impacts

FOCL operates two parallel grievance procedures that covers the onboard and shoreside operations, the below is a summary of incident and compensation paid.

<b>Onboard</b>	<b>Number</b>	<b>Total amount of material fines, penalties, and compensation for damages as a result of the incidents and complaints (£)</b>
Total incidents of discrimination, including harassment, reported in the reporting period	Zero	Zero
Complaints filed through internal channels incl. grievance mechanisms	Twelve	
<b>Severe human rights incidents</b>		
Number of severe human rights incidents	Zero	Zero

<b>Shoreside</b>	<b>Number</b>	<b>Total amount of material fines, penalties, and compensation for damages as a result of the incidents and complaints (£)</b>
Total incidents of discrimination, including harassment, reported in the reporting period	Zero	Zero
Complaints filed through internal channels incl. grievance mechanisms	Zero	
<b>Severe human rights incidents</b>		
Number of severe human rights incidents	Zero	Zero

## 4. Governance information

### 4.1 (ESRS G1) Business conduct

#### 4.1.1 G1 General disclosure

#### 4.1.2 G1 Impact, risk and opportunity management

##### G1-1 – Corporate culture and business conduct policies

FOCL have a Code of Conduct that provides a clear understanding of Company expectations for all Officers, Crew and Non-Revenue Guests. The policy is written in a simplistic manner to reduce any potential for misinterpretation thus helping all that fall within the scope of the policy to understand and remain in compliance. Links to other key onboard policies are referenced within the document to further assist our crew to fully understanding the relevant content

The management culture onboard encourages managers and crew to monitor and report instances where the onboard Code of Conduct is not followed, instigating a duel onboard / shoreside investigation relevant to specific events. Where required, disciplinary action will be taken in line with the relevant approved Collective Bargaining Agreement (CBA) for the crewmember.



### G1-3 – Prevention and detection of corruption or bribery

During the 2023 financial year FOCL provided training to all of its own workers in terms of its Policy. The training is mandatory for all employees. Details of its training during the year is as follows:

	Shoreside	Onboard Crew
Training coverage		
Total	210	3329
Total receiving training	210	3329
Frequency		
How often training is required	Once	Annually
Topics covered		
Definition of bribery	✓	✓
Policy	✓	✓
Procedures on suspicion/detection	✓	x

Annex 6 of the CBA specifically references victimisation of a seafarer for filing a complaint, confirming this as prohibited and penalised according to the gravity of actions taken against the seafarer.

While there are multiple policies relating to specific types of training, FOCL do not have an overriding training policy within the organisation on business conduct.

#### 4.1.3 G1 Metrics and targets

##### G1-4 – Confirmed incidents of corruption or bribery

During the financial year 2023 FOCL had no reported cases of corruption and bribery. Violation of anti-corruption and anti-bribery laws:

Number of convictions	Zero (0)
Amount of fines (£)	Zero (0)
Actions taken to address identified breaches in procedures and standards of anti-corruption and anti-bribery (description of action - text)	N/A
Confirmed incidents total (number)	Zero (0)
Confirmed incidents total (description of nature - text)	N/A
Confirmed incidents resulting in dismissal or disciplined actions (number)	Zero (0)
Confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption (number)	Zero (0)
Details of public legal cases regarding corruption or bribery brought against the FOCL and its own workers during the reporting period and the outcomes of such cases (Description – text)	N/A