

2025

Sustainability Report

MESSAGE FROM THE FOUNDERS



A CLEAR HORIZON FOR SUSTAINABLE SHIPPING

2025 was a year that tested resilience and required disciplined execution. Against a backdrop of geopolitical uncertainty, evolving regulation and accelerating technological change across the maritime sector, Pelagic Partners remained focused on pursuing long-term value creation while advancing its sustainability priorities.

Sustainability is increasingly embedded in how we assess investments, oversee maritime assets and conduct our operations. This report outlines the progress made during 2025 and demonstrates how environmental, social and governance considerations continue to inform our strategy, risk management and decision-making.

We believe that responsible business practices are essential to protecting and creating long-term value. During 2025, the Funds' reported financial performance was adversely affected by decreases in the fair value of certain vessels. Against this backdrop, we maintained a disciplined, long-term approach to asset management while continuing to enhance environmental stewardship, support our people and strengthen our governance framework. This balanced approach remains central to building resilience and creating sustainable value for our investors and other stakeholders.

As a fund manager focused on maritime assets, we recognise the responsibilities associated with our activities. We remain committed to robust corporate governance, regulatory compliance and risk management, while continuing to align our practices with evolving European and international frameworks. Through these efforts, we seek to contribute meaningfully to the maritime industry's transition towards decarbonisation and a more sustainable future.

We invite you to read our 2025 Sustainability Report, which provides a transparent account of our progress, challenges and priorities. We recognise that further work lies ahead, but we are confident that, together with our investors, partners and other stakeholders, we can continue building a more resilient, responsible and sustainable maritime sector.

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General Disclosures

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General Disclosures

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1.1 GENERAL BASIS FOR THE PREPARATION OF THE SUSTAINABILITY REPORT (B1)

ABOUT THIS REPORT

The shipping industry underpins the global economy, yet faces significant sustainability challenges. We recognise our responsibility to protect both the environment and our people through the practices we adopt.

With this in mind, we are pleased to present our Sustainability Report (the “Report”) for the year 2025 (01/01/2025 – 31/12/2025, “FY2025”), reflecting on our contribution to the industry’s transition. This Report provides a transparent view of our efforts to advance sustainability across our operations, the shipping industry, and the broader economy.

This Report has been prepared with reference to the Voluntary Standard for non-listed Micro-, Small- and Medium-sized undertakings (“VSME”), supporting clear and verifiable disclosure of our sustainability performance. While Pelagic Partners is classified under Article 6 of the Sustainable Finance Disclosure Regulation (“SFDR”), we have, for a second consecutive year, voluntarily applied the VSME framework to enhance transparency and deliver consistent, comparable information to our stakeholders. Our disclosures follow OPTION B of the VSME, integrating requirements from both the basic and comprehensive modules. A detailed index of disclosures is provided in the Appendix.



There were no significant changes to our operations or organisational structure during FY2025. As a result, the methodology of our sustainability reporting, including our materiality assessment, remain unchanged from the prior year. For the underlying approach and rationale for our material topics, please refer to our FY2024 Sustainability Report, Section 7.1 ‘Description of the Materiality Process’, available through the following link: [2024 Sustainability Report](#)

Through this Report, we aim to give stakeholders a clear overview of how we integrate Environmental, Social and Governance (ESG) considerations into our investment strategies and operations.

SCOPE OF THE REPORT

The scope of this Report covers the ESG impacts attributable to both the investment fund (i.e. Pelagic Investment Fund RAIF V.C.I.C. Plc), and the external manager (i.e. H.M Pelagic Partners Ltd) (together referred to as “Pelagic Partners” or “the Group”).

For the purposes of this Report, Pelagic Investment Fund RAIF V.C.I.C. Plc and H.M Pelagic Partners Ltd are referenced as “Investment Fund” and “External Manager”, respectively. Information is disclosed on a consolidated basis, capturing the full range of the data available across the Group.

H.M. Pelagic Partners Ltd is incorporated under the Laws of Cyprus with registration number HE 424510 and authorised by the Cyprus Securities & Exchange Commission (CySEC) to operate as an Alternative Investment Fund Manager with license number AIFM43/56/2013.

Pelagic Investment Fund RAIF V.C.I.C. PLC is registered and incorporated under the Laws of Cyprus with registration number HE 408436 and authorised by the Cyprus Securities & Exchange Commission (CySEC) to operate as a Registered Alternative Investment Fund with registration number RAIF30.

The list of all the Group entities that are considered ‘in-scope’ (and, therefore, the data and information of which are included in this Report) has been determined through a scoping exercise. It should be noted that all entities in which the Group holds more than 50% ownership were included. However, vessels within those entities where the individual entity’s ownership share was below 50% were excluded.

LIST OF ALL THE GROUP ‘IN-SCOPE’ ENTITIES

- H.M. Pelagic Partners Ltd
- Pelagic Investment Fund RAIF V.C.I.C. Plc
- Bluwhirl Holding Limited (CY)
- Tench Maritime Co. Ltd (MH)
- Sea Flurry Ltd (MH)
- Marevia Holding III Co. Ltd (CY)
- Averono Ltd (CY)
- Azure Holding Limited (MH)
- Seaway Shipping Ltd (CY)
- Demile Ltd (CY)
- Questil Holdings Ltd (CY)
- Marevia Holding II Co. Ltd (MH)
- Hannover Maritime Co. Ltd (MH)
- Houston Maritime Co. Ltd (MH)
- Pelagic Wind Holding Ltd (CY)
- Pelagic Wind Services Ltd (CY)
- Windfinity Maritime Ltd (MH)
- Windlight Maritime Ltd (MH)
- Marevia Holding I Co. Ltd (CY)
- Marevista Shipping Co. Ltd (MI Co.)
- Pelagic Credit Plc (CY)
- Marevista Holding I Ltd (CY)
- Marevista Holding II Ltd (CY)
- Marevista Maritime I Ltd (MI)
- Marevista Maritime II Ltd (MI)
- Marevista Maritime III Ltd (MI)

DATA INTEGRITY AND BASELINE SETTING

As part of our commitment to transparent and accurate reporting, we have undertaken a significant enhancement of our data collection processes across the Investment Fund. In light of these improvements, we have re-established 2025 as our baseline year for the Investment Fund, ensuring that all future performance metrics are measured against a consistent and rigorous standard.

GENERAL DISCLOSURES

A summary of the Group's general disclosures, as per the VSME guidelines, is provided in the table below:

2025 GENERAL DISCLOSURES SUMMARY ¹		
DESCRIPTION	EXTERNAL MANAGER	INVESTMENT FUND
Legal form	Private Limited Liability Company	Private Limited Liability Company
NACE sector classification code	L.66.30	L.64.31
Size of the balance sheet ²	EUR 3,043,500	USD 192,252,374 ³
Turnover ²	EUR 3,142,900	USD (6,989,749)
Number of employees ⁴	13	482 ⁵
Country of primary operations and location of significant assets	Cyprus	Cyprus ⁶
Geolocation of sites owned, leased or managed	Cyprus	Cyprus ⁶

Note:

1. It is noted that no significant changes took place regarding the sector, geography and operations of the Group.
2. The size of the balance sheet (total assets) and the turnover for both the External Manager and Investment Fund, are derived from the Financial Statements for the year ended 31 December 2025. The figures have been rounded up.
3. This figure represents the total Assets Under Management (AUM).
4. The cumulative total number of employees throughout the reporting period.
5. The figure includes crew members, who are not directly employed by the Group but employed by the Group's appointed Ship Managers.
6. While the Investment Fund is registered in Cyprus, its assets operate worldwide.

Strategy & Business Model

2



Strategy & Business Model 2.1

2.1 ABOUT PELAGIC PARTNERS (C1)

BUSINESS MODEL

The External Manager is a Cyprus-based alternative investment fund manager with extensive experience in maritime investments and asset management across the international shipping and offshore sectors. Through the Investment Fund and its underlying structures, the Group pursues investment opportunities across a diversified range of maritime assets, including bulk carriers, oil tankers, chemical and product tankers, offshore support vessels and offshore commissioning service operation vessels (CSOVs).

The Group primarily operates within institutional and maritime business-to-business markets with international exposure across the shipping, maritime financing and offshore energy sectors.

Currently, it manages four active compartments, namely Pelagic Fund I, Pelagic Yield Fund, Pelagic Wind Fund and Marevia Credit Fund I, with assets under management exceeding USD 280 million as at 31 December 2025. The Group's activities include the acquisition, financing, management and monitoring of maritime assets and related investment structures. Marevia Credit Fund I focuses on maritime credit opportunities, including financing structures relating to maritime assets under construction, sale and leaseback transactions, and the

acquisition of newbuild and second-hand maritime assets. In addition to traditional shipping investments, the Group is also involved in the construction and operation of CSOVs, primarily intended to support offshore wind and broader offshore energy activities.

Diversification remains a key component of the Group's investment philosophy, with a focus on maintaining balanced exposure across vessel types, counterparties, jurisdictions and market cycles. The Group seeks to pursue investments where it believes it can combine downside protection, operational flexibility and long-term value preservation.

The Group maintains relationships with ship managers, charterers, financial institutions, brokers, technical consultants, legal advisers, auditors, depositaries, administrators and other professional service providers relevant to its investment and operational activities. It also engages with shipyards, offshore service providers and counterparties involved in maritime financing, vessel construction and offshore energy projects.

TANKERS (X4)

Transport liquids globally, meeting most energy needs. Product Tankers deliver diesel, gas oil, lubricating oil, and petrol from refineries to ports for industrial consumers.

DRY BULK CARRIERS (X2)

The workhorses of the merchant fleet, transporting raw materials that enable global populations to build homes, generate energy, produce food, and manufacture goods.

GENERAL CARGO (X3)

Versatile carriers of the merchant fleet, transporting a wide range of packaged and breakbulk good (such as machinery, steel, timber, and project cargo) that support global trade and industry.

CSOV (X2 UNDER CONSTRUCTION)

Vessels used to support the commissioning and maintenance of offshore wind farms. They provide accommodation, equipment, and logistics support for technicians working on turbines and other offshore infrastructure.

BROAD PORTFOLIO SCOPE

Investment targets operate in segments which the management team comprehensively understands. This includes a range of vessels such as bulk carriers, chemical and product tankers, offshore support vessels and CSOV vessels currently under construction.

We prioritise diversification as a fundamental philosophy by seeking agile, well-informed investments that reduce concentration risk in any single segment. Backed by extensive market knowledge and experience, Pelagic Partners maintains a broad portfolio scope, allowing flexibility to explore nearly every shipping or offshore segment that aligns with our investment strategy. This adaptive approach underscores the Group's agility in responding to market dynamics while leveraging deep industry expertise to optimise investment opportunities across diverse maritime sectors.

Note:

1. The assets listed here represent the number of vessels that were held at any point during FY2025, including those that were sold or purchased within the year. The disclosures that follow have been calculated in accordance with the period of ownership, on an aggregated basis, excluding vessels under construction as they do not have operations.

PELAGIC Fund I

SUBSCRIPTION WINDOW | JULY 2020 – JULY 2021

Pelagic Fund I maintained a disciplined and diversified portfolio across three vessels, balancing stable cash flow with strategic upside. Key highlights included strong unlevered returns from one of the vessels, partial monetisation of another, and an offshore charter with a major energy company through one of its assets. By the end of 2025, it reached over US\$40 million in assets under management.

Since its inception, the net asset value (NAV) of Pelagic Fund I has more than doubled, including one dividend payment of approximately 3%. During 2025, the NAV reached a cumulative appreciation of 161% since its activation in July 2020, excluding dividend payouts.

FUND I KPI

161%

NAV INCREASE

PELAGIC Yield Fund

SUBSCRIPTION WINDOW | MAY 2022 – PRESENT

Pelagic Yield Fund launched in Q1 2022 and reached more than US\$152 million in assets under management by the end of 2025. This compartment operates with a flexible approach to vessel age, profile, and segment, aiming to provide investors with consistent annual returns by prioritising long-term employments.

Targeting to have 50% of its fleet on charter, the compartment leverages Pelagic Partners' extensive knowledge in ship owning and fleet management, alongside its deep commercial expertise across various segments within the maritime industry. This strategic acumen enables the effective distribution of assets across long term charters and short-term commercial pool arrangements, enhancing cash-flow visibility to power annual distributions while maintaining sufficient flexibility to capture market upswings. During 2025, the NAV reached a cumulative appreciation of 114% since its activation in April 2022, excluding dividend payouts.

YIELD FUND KPI

114%

NAV INCREASE

PELAGIC

Wind Fund

SUBSCRIPTION WINDOW | SEPTEMBER 2022 – PRESENT

Pelagic Wind Fund embodies Pelagic Partners' commitment to sustainable investments and represents a compelling opportunity for investors to capitalise on the growing demand for renewable energy. We specialise in providing purpose-built Commissioning Service Operation Vessels (CSOVs) designed to support offshore wind operations as a priority, while maintaining the versatility to operate across wider offshore energy segments, including oil and gas, in line with market demand.

We understand the importance of sector specialism and track record in such niche markets, and have therefore established Pelagic Wind Services, run by a team with proven track record and a network of reliable partners stretched across various geographical regions within the offshore wind industry. As of 2025, the fund reached over US\$47 million in assets under management.

OFFSHORE EXPERTISE

With cutting-edge technology and years of offshore experience, we are eager to assist our clients on their journey towards the production of green energy. Our team is equipped with the knowledge and expertise to provide reliable and efficient services, ensuring the smooth operation of wind farms and the sustainable generation of clean power.

MAREVIA

Credit Fund I

SUBSCRIPTION WINDOW | OCTOBER 2025 – PRESENT

Marevia Credit Fund I reflects Pelagic Partners' strategy of combining credit discipline with maritime expertise. The Compartment focuses on financing assets under construction and the acquisition of newbuild and second-hand vessels through secured, income-generating structures.

The fund begun deployment in 2025, reaching more than US\$43 million in assets under management, with transactions structured to balance income generation and capital preservation. By applying comprehensive due diligence and a disciplined credit framework, the Fund is committed to support the financing of modern maritime assets and contribute to the sector's ongoing renewal and transition. Since its activation in October 2025, the NAV reached a cumulative appreciation of 3%.

CREDIT STRATEGY EXPERTISE

Marevia Credit Fund I reflects Pelagic Partners' strategy of combining credit discipline with maritime expertise. The Compartment focuses on financing assets under construction and the acquisition of newbuild and second-hand vessels through secured, income-generating structures.

Strategy & Business Model 2.2

2.2 TRANSITIONING TOWARDS A MORE SUSTAINABLE ECONOMY (B2, C1, C2, C3)

OUR VISION

Pelagic Partners is committed to supporting sustainability objectives and industry transition efforts towards 2030, informed by internationally recognised frameworks including the Paris Agreement and the United Nations Sustainable Development Goals (SDGs).

Sustainability-related considerations are integrated into relevant decision-making, investment evaluation and risk management processes in a manner consistent with the Group's regulatory and operational framework. The Group's investment strategy combines assessment of vessel values, downside risk protection, market conditions, charter visibility and operational flexibility. As part of this approach, the Group seeks to identify elevated operational, regulatory and reputational risks associated with potential investments while supporting long-term value preservation and operational resilience.

The Group also seeks to support investments in modern and operationally efficient maritime assets, including vessels designed with technologies intended to reduce environmental impact. Through Pelagic Wind Fund and the construction and operation of CSOVs, the Group maintains exposure to offshore wind infrastructure and broader energy transition activities.

To support the integration of sustainability-related considerations across the Group's operations and investment activities, ESG Champions have been appointed within key departments. These roles are currently held by the Head of Portfolio Management and the Head of Risk Management & Regulatory Compliance. Sustainability-related matters are periodically



considered at Board and senior management level as part of the Group's governance, compliance and risk oversight framework.

In furtherance of these efforts, and with a view to strengthening the transparency and rigour of its sustainability practices, the Group has also entered into a three-year contract with an external advisory firm to support the delivery of accurate and timely sustainability reporting.

The Group recognises that climate-related physical and transition risks may impact maritime operations, asset values, financing conditions and operational costs over time. Relevant risks include evolving maritime environmental regulations and decarbonisation requirements; carbon pricing mechanisms and emission-related compliance costs; fuel transition uncertainty and technological developments; changing stakeholder and market expectations; operational disruptions arising from severe weather conditions; and potential long-term impacts on vessel competitiveness and asset values. These risks are considered as part of the Group's broader investment evaluation, monitoring and risk management processes.

To formalise its approach, the Group is developing a Sustainability Policy Framework and a Sustainability Reporting Procedure, both of which are expected to be implemented in 2026. Moving forward, the Group intends to continue monitoring developments relating to climate-related regulation, decarbonisation initiatives and sustainability-related reporting obligations relevant to the maritime and financial sectors.

Corporate Governance

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3.1 POLICIES, OVERSIGHT, AND DEPARTMENTS (B2, C2)

GROUP POLICIES

Pelagic Partners maintains robust policies and manuals currently being implemented across offshore and onboard operations to ensure ongoing sustainability efforts are effective and measurable.

These policies cover a range of topics including risk management, environmental management, health & safety, security, whistleblowing, personal data protection, cyber & information security, sanctions, anti-bribery and corruption, ethical governance, and replacement procedures.

STRATEGIC AND EXECUTIVE OVERSIGHT

Our governance structure is designed to support the aforementioned policies with clear roles, responsibilities and processes that guarantee accountability and facilitate regular review of our sustainability practices.

Oversight of sustainability-related matters rests with the Board of Directors, which holds ultimate responsibility for the strategic direction, governance framework and risk oversight of the Group.

The Board is composed of six Directors, including four Executive Directors and two Independent Non-Executive Directors, reflecting a balance of experience and perspectives across investment management, shipping, finance, governance and regulatory matters. The Board meets at least quarterly, with additional meetings convened where required in connection with significant transactions, investment approvals or operational matters.

The Board oversees relevant policies, governance standards, regulatory compliance and risk management processes, including sustainability-related considerations where relevant to the Group's activities, investments and operations.

Sustainability-related matters are periodically discussed at Board and senior management level as part of the Group's broader governance and risk oversight framework.

The Executive Directors are responsible for the day-to-day management of the Group and for implementing the strategies, operational framework and oversight procedures established by the Board.

GROUP DEPARTMENTS

INTERNAL AUDIT

The Internal Audit function plays a crucial role in our governance structure by reviewing and verifying the integrity and effectiveness of our internal controls and corporate governance processes. While external auditors and legal advisors play a pivotal role in our governance structure, providing third-party oversight and ensuring compliance with laws and standards, the internal auditors review and verify the integrity and effectiveness of our internal controls and corporate governance processes.

COLLECTIVE MANAGEMENT SERVICES

Our Collective Management Services encompass portfolio management, marketing and fund administration, which are integral to the Group’s governance framework, supporting consistent application of policies and ensuring alignment with our long-term strategy.

REGULATORY COMPLIANCE

Our Regulatory Compliance function ensures that all operations comply with applicable legal and regulatory standards. The Regulatory Compliance function, led by the Head of Regulatory Compliance, oversees adherence to financial services regulation, environmental and labor requirements, and other obligations relevant to the Group’s activities. This includes monitoring regulatory developments, updating internal policies, and coordinating with supervisory authorities where required.

BACK OFFICE

Back office supports the entire Group and includes departments like accounting & finance, in-house administration, and IT. These departments ensure that all business processes are aligned with our governance structure and sustainability commitments.

RISK MANAGEMENT

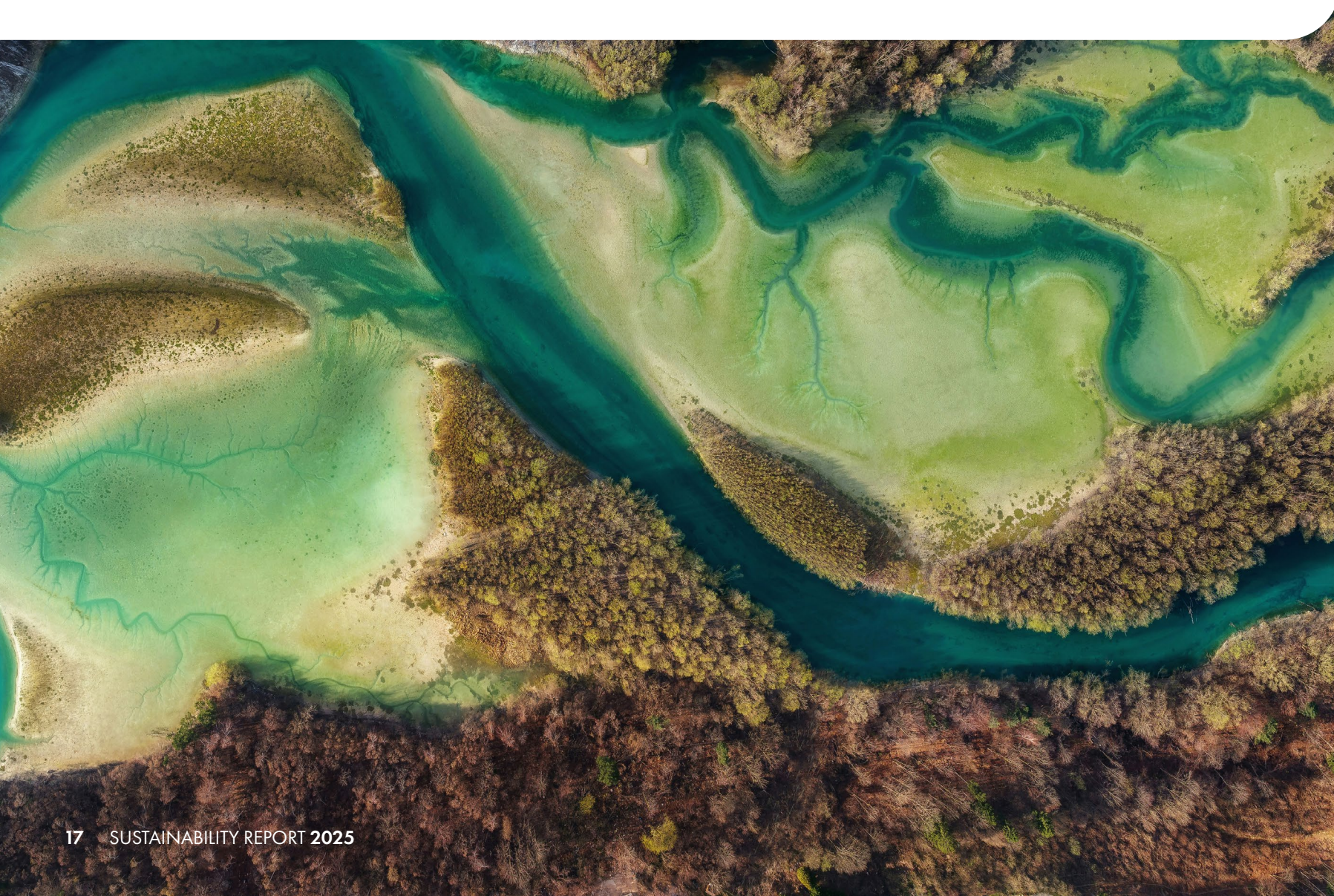
Our Risk Management function is tasked with identifying, assessing, and managing risks that could impact our business, including financial, operational, environmental and social risks. This proactive approach helps us mitigate potential issues before they affect our operations and ensures we remain resilient and adaptable in a changing business landscape.

AML COMPLIANCE

Our Anti-Money Laundering (AML) Compliance function ensures that all operations comply with AML laws and regulations. The AML Compliance Officer (AMLCO) is responsible for the Group’s anti-money laundering framework. This includes implementing customer due diligence procedures, monitoring transactions, and ensuring that our financial practices remain transparent and consistent with applicable AML laws and regulations.

Environmental

4



Environmental

4

Conscious of the environmental impacts associated with our operations, Pelagic Partners incorporates environmental considerations into decision-making at all levels. This involves balancing operational capabilities and long-term environmental objectives in our investment strategy.

Monitoring, tracking, and reporting our progress across a range of environmental issues is a key component to this approach. This section of the Report discloses initiatives, policies, and metrics relevant to our environmental performance.

While the Investment Fund is classified under Article 6 of the SFDR, Pelagic Partners as a Group remain committed to transparency and align our efforts with SDG7, SDG12, SDG13, and SDG14.

The topics presented in this section are associated with the following SDGs:



Environmental Topics

4.1 Climate Change

4.2 Pollution

4.3 Biodiversity and Ecosystems

4.4 Water and Marine Resources

4.5 Circular Economy

4.1 CLIMATE CHANGE (B3, C3, C4)

ENERGY AND GREENHOUSE GAS EMISSIONS

At Pelagic Partners, we are progressively working towards reducing our greenhouse gas (GHG) emissions and improving air quality. To date, we have applied a methodical approach: utilising cleaner fuels, exploring viable gas alternatives, and assessing the options of significant technological upgrades. Our strategy is aligned with the sector's standards to ensure our operations are efficient, compliant, and environmentally responsible.

This is supported by the Group's Risk Management Policy which integrates environmental risk considerations into investment decisions. As part of our climate mitigation efforts, we are currently constructing vessels designed with advanced technologies to reduce emissions during operations. These vessels are purpose-built to serve offshore wind projects as a priority, while retaining the flexibility to operate in other offshore energy markets depending on conditions.

Through its offshore-related investments and activities, including Pelagic Wind Fund and CSOV-related projects, the Group aims to support offshore energy infrastructure and related maritime services while maintaining a commercially disciplined and risk-focused investment approach.



In addition to the above measures, the Group's maritime operations fall within the scope of the EU Emissions Trading System (EU ETS), established under Directive 2003/87/EC. Since 1 January 2024, the EU ETS has been extended to cover CO₂ emissions from large ships entering EU ports, regardless of the flag they fly. Under this framework, the Group is required to monitor, report, and verify its greenhouse gas emissions from qualifying voyages in accordance with the EU Maritime MRV Regulation, and to surrender corresponding emission allowances on an annual basis.

This regulatory obligation complements the Group's existing climate strategy, as our investment in cleaner fuels and advanced vessel technologies directly supports EU ETS compliance while reducing operational emissions across the fleet.

The Group intends to continue assessing opportunities to improve the environmental performance and operational efficiency of its maritime investment and operations over time, including ongoing evaluation of vessel technologies intended to improve fuel efficiency and reduce emissions' operational optimisation initiatives; developments in alternative fuel solutions' evolving maritime environmental regulation; and opportunities associated with offshore wind and broader offshore energy transition activities.

To facilitate these climate objectives and regulatory requirements, we actively monitor energy consumption across both our offshore and onshore operations and tracking Scope 1 and Scope 2 emissions, where applicable.

It should be noted that the External Manager underwent a relocation during FY2025, which made it difficult to accurately and reliably collect and report energy data for the period. Accordingly, energy figures have been compiled on a best-efforts basis using the data available at the time of reporting. Where data is not available for this reporting period, data has been extrapolated based on the months of monitoring following the relocation.

Although our Scope 3 GHG emissions are not calculated within a rigid framework, we remain mindful and intentional in our evaluations. Moving forward, we are continuously refining and recognising the value of formalising our approach.



ENERGY CONSUMPTION

The 2025 energy consumption metrics (MWh) for the External Manager and Investment Fund are presented in the table below, with prior-year figures provided as a frame of reference.

DESCRIPTION		EXTERNAL MANAGER			INVESTMENT FUND		
		Renewable Energy Consumption (MWh) ³	Non-renewable Energy Consumption (MWh)	Total	Renewable Energy Consumption (MWh)	Non-renewable Energy Consumption (MWh)	Total
Electricity ¹	2024	- ⁴	-	33.99	0	0	0
	2025	0	-	19.75	0	0	0
Fuels ²	2024	-	-	-	-	-	-
	2025	0	0	0	0	110,984.22	110,984.22

Notes:

1. The External Manager operated as a tenant in a shared building and only had access to aggregated energy consumption data covering all tenants. To estimate its consumption, the total building energy use (sourced through the Electricity Authority of Cyprus (EAC)) was divided by the total number of employees in the building and then multiplied by the External Manager's headcount (13). Given that the External Manager relocated during FY2025, the figure has been calculated by extrapolating from the months of monitoring prior to relocation.

2. The calculation of fuel consumption (MWh) has been carried out using the StormGeo platform.

3. While the External Manager utilises renewable energy for its operations, including electricity generated from solar panels, it did not receive a detailed breakdown of its energy consumption in FY2024 and FY2025, limiting its ability to account for this information.

4. The dash (-) is used to indicate that there is no available information and should not be assumed to equate to zero.

GREENHOUSE GAS (GHG) EMISSIONS

The Greenhouse Gas emission metrics (tCO₂eq), along with the respective GHG intensity of the External Manager and Investment Fund, are presented in the table below:

KPI	EXTERNAL MANAGER ⁴		INVESTMENT FUND	
	2024	2025	2024	2025
Scope 1 GHG Emissions (tCO ₂ eq) ¹	0	- ⁵	-	93,469
Scope 2 GHG Emissions ² (tCO ₂ eq)	21.32	12.85	-	0
Gross GHG Emissions (tCO₂eq)	21.32	12.85	21.32	21.32
Turnover	EUR 3,400,000	EUR 3,142,900	USD 35,000,000	USD 6,989,749
GHG Intensity³	0.00000627	0.00000409	-	- ⁶

Notes:

1. The calculation of Scope 1 GHG emissions has been carried out using the StormGeo platform.
2. Scope 2 GHG emissions have been calculated as follows: *Energy Consumption × Emissions Factor*

For the calculation of Scope 2 GHG emissions, the Group used an emissions factor of 0.62752kgCO₂/kWh in accordance with the Transmission System Operator Cyprus.

3. The GHG intensity of GHG emissions has been calculated as follows: *(Gross GHG Emissions)/Turnover*

4. Scope 2 GHG emissions (tCO₂eq) disclosed for the External Manager are indicative, as the contribution of renewable energy could not be accounted for in the estimation.

5. The dash (-) is used to indicate that there is no available information and should not be assumed to equate to zero.

6. The GHG intensity could not be calculated as turnover is negative, rendering the ratio meaningless for analytical purposes.

4.2 POLLUTION (B4)

AIR AND WATER POLLUTION

Pelagic Partners is dedicated to reducing the environmental impact resulting from shipboard operations. We strive for zero spills and releases that may lead to marine pollution. To support this goal, crew members, contractors, and visitors are obliged to stop any work that may result in adverse environmental impact.

We are proud to disclose that in 2025 there were zero spills or spill related incidents in the marine environment from our fleet.

Although we do not currently measure emissions from pollutants, we undertake various initiatives aimed at minimising our environmental impact and promoting cleaner operational practices. In 2025, many of our vessels used very low sulphur fuel (VLSFO), ultra-low sulphur fuel (ULSFO) and distillates (an alternative fuel option in that significantly minimises adverse air quality emissions by mitigating the addition of sulphur dioxides into the atmosphere). This initiative is part of our immediate response to environmental concerns and represents our baseline effort to comply with global emissions standards, demonstrating our proactive stance in contributing to cleaner maritime operations.

4.3 BIODIVERSITY AND ECOSYSTEMS (B5)

SEA-USE CHANGE

At Pelagic Partners, we aim to progressively reduce our impact on marine life and habitats, mitigate risks associated with marine pollution and enhance the health of marine environments through careful alignment with emerging technologies and global conservation efforts. Our strategy in doing so involves exploring and gradually implementing measures to ensure our operations are harmonious with marine habitats.

In addition to reducing adverse air emissions, the use of VLSFO and ULSFO helps to limit harmful residues that could otherwise affect marine ecosystems.

We are also investing in modern anti-fouling technologies, which are critical in preventing the accumulation of marine organisms on hulls. These measures reduce the risk of introducing invasive species, which can disrupt local biodiversity and food chains, while at the same time improving vessel efficiency.

In line with International Maritime Organization (IMO) guidelines, we also work to minimise time spent in biodiversity-sensitive areas, thereby reducing potential disturbance to vulnerable ecosystems.

4.4 WATER AND MARINE RESOURCES (B6)

BALLAST WATER MANAGEMENT

The majority of our vessels are equipped with advanced ballast water treatment systems that effectively filter out sensitive marine organisms, thereby preventing the unintended transfer of invasive species across different marine ecosystems.

We regularly evaluate the effectiveness of these systems through testing and reporting procedures to ensure they operate as intended and minimise ecological risks, a critical concern given the potential impact on marine biodiversity.

In 2025, we continued our efforts for the ballast water on our vessels to be processed through ballast water exchange or ballast water treatment, ensuring we meet our compliance obligations with the International Ballast Water Management Convention.

BALLAST WATER MANAGEMENT

Monitoring water production, consumption, and discharge allows us to assess the Group’s operational impact on local water resources and identify opportunities for efficiency and reduction. Water production and consumption relate primarily to the vessels, capturing the freshwater generated or bunkered and the quantities used on board. Water discharge, on the other hand, is an area where the Group aims to measure, where possible, across its shore-based operations, reflecting the volumes released to the environment. Together, these measures enable us to we gain insight into potential environmental risks and can manage them more effectively. Due to the change in collection methodology for the Investment Fund, no data could be obtained for six of the vessels captured by this reporting period. A number of these vessels were in drydock during the majority of the relevant period, and accordingly, the absence of water management data is not considered substantive.

The remaining vessels’ water management data can be seen in the table below.

FRESH WATER MANAGEMENT				
KPI	EXTERNAL MANAGER		INVESTMENT FUND	
	2024	2025	2024	2025 ³
Water Production (m³)	- ¹	-	-	3,671
Water Consumption (m³)	-	-	-	5,523
Water Discharge (m³)	1,705	-	-	1,847
Water Utilisation Rate ²	-	-	-	150%

Notes:

- 1. The dash (–) indicates that the information is not reported and should not be assumed to represent zero.
- 2. The water utilisation rate was calculated as follows: Water Consumption / Water Production
- 3. The figures presented encompass the vessels for which data was available during the reporting period.

4.5 CIRCULAR ECONOMY (B7)

WASTE MANAGEMENT ONBOARD

Although this topic and sub-topic were not initially identified as material, Management opted to include it due to its strategic importance in advancing a sustainable economy.

Where permitted, recycling is carried out on board all vessels. Materials recycled include, but are not limited to, plastic and metal drums, as well as wooden pallets. Paper, plastic bottles, and wooden pallets are also re-used onboard where feasible. Recyclable materials are segregated from non-recyclable waste, which is then managed and collected by authorised waste handlers in accordance with regulatory requirements. Crew members receive training on waste management practices, with the implicit objective of minimising waste generation on board. However, the Investment Fund does not currently hold data on the volumes of materials recycled or re-used onboard for the reporting period.

It should be noted that the External Manager underwent a relocation during FY2025, which made it difficult to accurately and reliably collect and report waste data for the period.

Additionally, due to the change in collection methodology, disaggregated information on recycling and waste directed to disposal could not be obtained by the Investment Fund for six of the vessels; however, the combined figure for both categories amounts to 165t. As the majority of these vessels were in drydock for the majority of the reporting period, the combined figure is substantively lower than the remaining data of the Investment Fund of each waste category presented in the table.

2025 WASTE DIRECTED TO DISPOSAL¹

WASTE TYPE	INVESTMENT FUND
Plastic (t)	124.08
Food waste (t)	15.29
Domestic waste (t)	76.19
Cooking oils (t)	0.42
Incinerator ashes (t)	1.25
Operational waste (t)	26.9
E-waste (t)	1.30
Cargo residues (t)	78.50
Hazardous waste (t)	0
Sludge (t)	188.30
Total	512.24

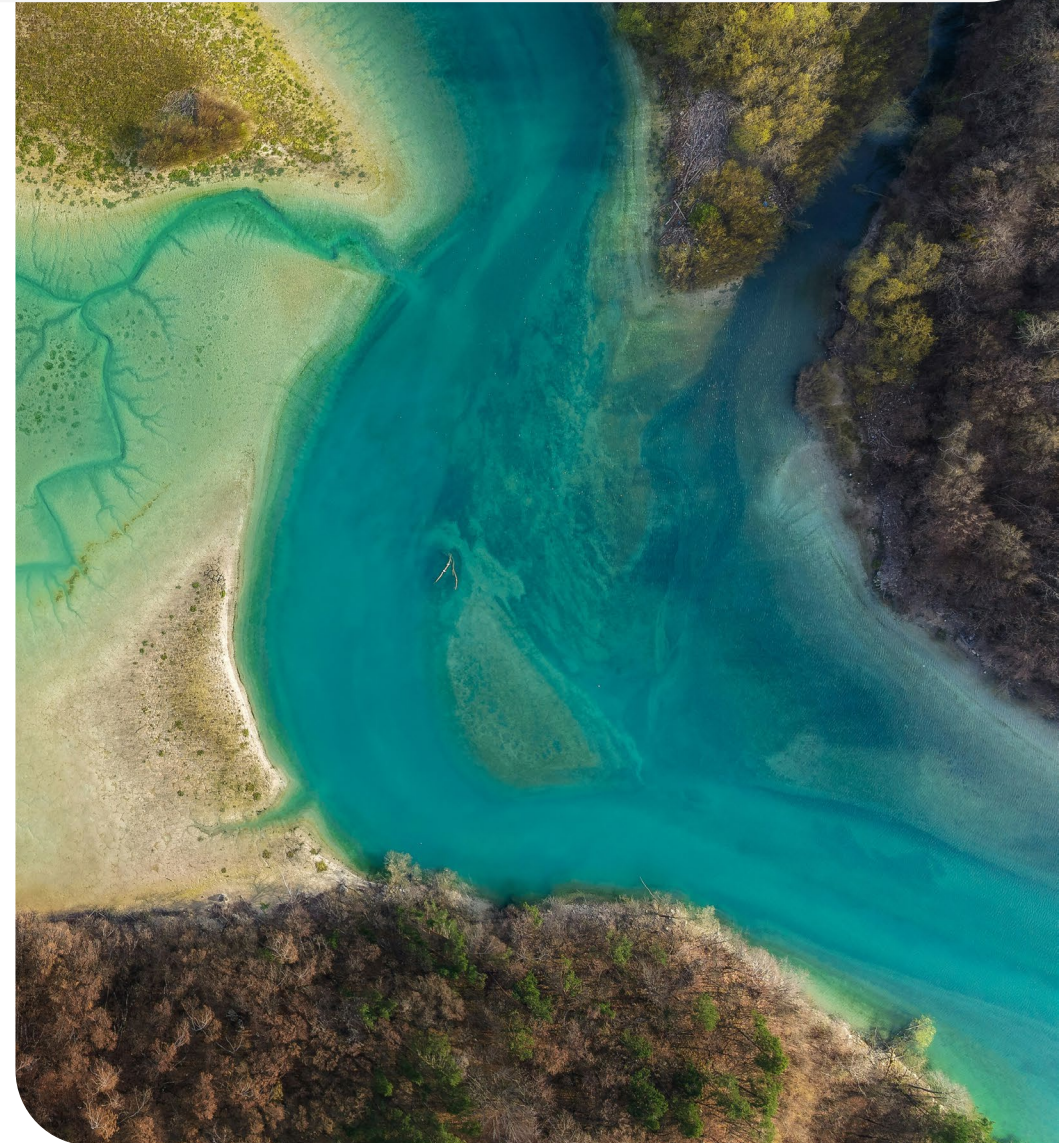
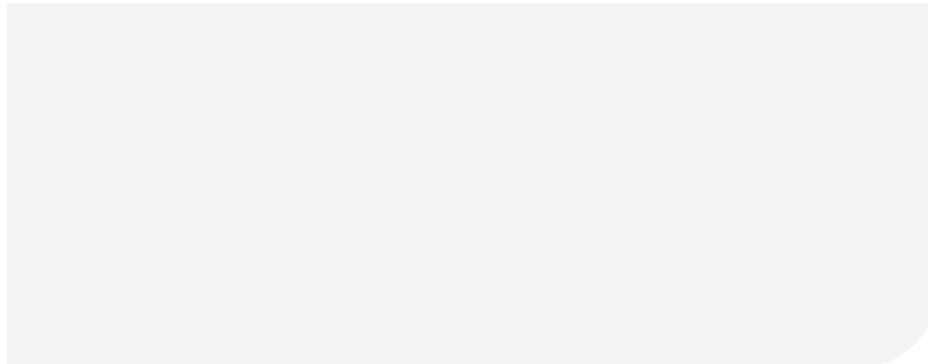
Notes:

1. The figures presented encompass the vessels for which data was available during the reporting period.

4.5 END-OF-LIFE RECYCLING OF VESSELS

The Group's approach to waste management extends beyond recycling initiatives and responsible waste disposal on board to encompass the end-of-life recycling of vessels. The Group is committed to ensuring that any ship recycling is conducted in a safe and environmentally sound manner, in accordance with the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships and the EU Ship Recycling Regulation (Regulation (EU) No 1257/2013).

This includes maintaining an Inventory of Hazardous Materials on board, identifying the location and approximate quantities of such materials, and ensuring that any end-of-life dismantling is carried out only at facilities included on the European List of compliant ship recycling facilities. These measures align with the Group's broader environmental strategy, reinforcing its commitment to minimising adverse effects on human health and the marine environment throughout a vessel's entire lifecycle.



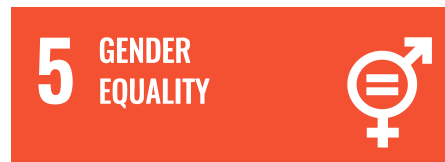


At Pelagic Partners, we continuously prioritise the wellbeing, professional development, health, and safety of our own workforce and the onboard crew serving on vessels managed by our appointed ship managers. While onboard crew are not directly employed by the Group, their welfare remains an important part of our ESG oversight.

Monitoring, tracking, and reporting our progress across operations is a vital component to ensuring the effective implementation of our social objectives. This section of the Report discloses initiatives, policies, and metrics relevant to our social performance.

While the Investment Fund is classified under Article 6 of the SFDR, Pelagic Partners as a Group continues to advance its own social objectives, with efforts referenced against SDG3, SDG5, and SDG8.

The topics presented in this section are associated with the following SDGs:



Social Topics

5.1 Own Workforce

5.2 Onboard Crew Members

5.3 External Stakeholders
and Affected Communities

5.1 OWN WORKFORCE (B8, B9, B10, C5)

SOCIAL RESPONSIBILITY

Pelagic Partners is committed to fostering a workplace environment that champions fairness and equality in all its labour practices. We strive to cultivate a supportive and inclusive atmosphere where each employee has access to opportunities for both personal and professional growth and development.

Our dedication to social responsibility places a strong emphasis on the safety and well-being of our entire workforce, ensuring that fairness permeates every aspect of our labour practices. In keeping with this commitment, all wages under both the External Manager and the Investment Fund adhere to minimum wage laws in Cyprus (€1,088 gross per month), reflecting our resolve to uphold fair compensation standards across every level of the organisation.

At Pelagic Partners, we regularly evaluate our HR policies and worker engagement initiatives, guaranteeing that all employees are treated with the utmost respect and equity. We are proud to uphold a culture where everyone feels valued and empowered to reach their full potential.



In its efforts to formalise the above, the Group maintains Employee Guidelines aimed at communicating expectations as well as benefits to all employees, ensuring that everyone is informed equally of their rights.

To achieve these standards of fairness and equality, we further recognise the critical role of tracking workforce characteristics and training hours. By systematically collecting and analysing data on employee demographics, skill sets, and participation in development activities, we gain valuable insights into the needs and progress of each employee.

WORKFORCE CHARACTERISTICS

At Pelagic Partners, we regularly monitor key performance indicators (KPIs) to ensure fair and equitable employment conditions for our direct workforce. Using a dedicated HR platform, we collect and track employee data to assess the effectiveness of our HR policies, measure progress, and identify areas for improvement. This data-driven approach enables us to make informed decisions and continuously enhance our workplace environment.

SECURE EMPLOYMENT

Metrics on turnover and retention provide insights into workforce stability and the effectiveness of engagement strategies. The Group reports on both its own workforce (office staff employed by the External Manager) and the onboard crew employed by our appointed ship managers. While Pelagic Partners does not directly employ crew, their numbers are reported under the Investment Fund column for transparency purposes, as they form a material part of vessel operations.

EMPLOYEE RETENTION				
KPI	EXTERNAL MANAGER		INVESTMENT FUND ⁴	
	2024	2025	2024	2025
Number of employees who left during the year ¹	1	0	- ⁵	24
Average number of employees during the year ²	13	13	-	-
Turnover Rate³	7.69%	7.69%	-	-%

In addition to retention, we also monitor the distribution of contract types. This reflects permanent contracts for our direct workforce and temporary contracts for onboard crew, which are managed by our ship managers.

The Group's breakdown of employees by contract type for is presented in the table below:

NUMBER OF EMPLOYEES BY CONTRACT TYPE ⁶				
CONTRACT TYPE	EXTERNAL MANAGER		INVESTMENT FUND	
	2024	2025	2024	2025
Temporary (Crew Members)	0	0	-	482
Permanent	13	13	-	-
Total	7.69%	7.69%	-	482

Notes:

1. Represents the total number of terminations that occurred as a result of resignations, retirements, dismissals, death, or contract expiration. This was calculated by headcount.
2. Derived from the mean of the headcount reported for each month.
3. The employee turnover rate has been calculated as follows: (Number of employees who left during the year / Average number of employees during the year) x100
4. The figure represents the crew members, who are employed by the Group's appointed Ship Managers.
5. The dash (-) indicates that the information is not reported and should not be assumed to represent zero.
6. Total number of active contracts during the reporting period.

GEOGRAPHIC DISTRIBUTION OF EMPLOYMENT CONTRACTS

The Investment Fund operates vessels with crew employed in multiple countries beyond Cyprus. The table below presents the number of employees by country of employment contract, distinguishing between the External Manager's direct workforce in Cyprus and the onboard crew employed by ship managers under the Investment Fund. This approach supports transparency in workforce reporting and provides insight into geographic distribution reported under the Investment Fund column for transparency purposes, as they form a material part of vessel operations.

CONTRACTS BY COUNTRY ¹				
COUNTRY	EXTERNAL MANAGER		INVESTMENT FUND ⁴	
	2024	2025	2024	2025
Philippines	0	0	- ³	320
Poland	0	0	-	32
Ukraine	0	0	-	87
Cyprus	13	13	-	6
Russia	0	0	-	7
Other Countries	0	0	-	28
Total Employees	13	13	-	482

Metrics on workforce composition enable us to evaluate our success in promoting gender diversity within our workforce, which is part of our broader focus to creating an inclusive workplace environment. As seen in the table below, for the year 2025, the male-female ratio of the External Manager and Investment Fund was 7:6 and 480:2 respectively:

NUMBER OF EMPLOYEES BY GENDER (2024) ⁴				
GENDER	EXTERNAL MANAGER		INVESTMENT FUND	
	2024	2025	2024	2025
Male	7	7	-	480
Female	6	6	-	2
Other	0	0	-	0
Total	13	13	-	482

Notes:

1. Total number of active contracts during the reporting period.
2. The figure represents the crew members, who are employed by the Group's appointed Ship Managers.
3. The dash (-) indicates that the information is not reported and should not be assumed to represent zero.
4. Total number of employees during the reporting period.

TRAINING AND SKILL DEVELOPMENT

We are committed to providing equal opportunities for all employees and ensuring fair treatment in all aspects of employment, including training. While this sub-topic did not meet the materiality threshold based on stakeholder input Management considers it strategically relevant to the Group's workforce development initiatives and has chosen to include it within the scope of this Report.

The training, skills, and dedication of employees are key factors in the Group's success. Recognising the value of our people, we aim to provide an environment that supports development and advancement opportunities, encouraging employees to strengthen their professional capabilities. As such, employees are provided with opportunities to enhance their skills and knowledge through a range of development programmes, including courses, seminars, conferences and e-learning platforms.

In the table below, the trainings hours offered to employees are presented as part of their continuous professional development:

TRAINING HOURS BY GENDER ¹				
GENDER	EXTERNAL MANAGER		INVESTMENT FUND	
	2024	2025 ²	2024	2025
Male	95	87	- ³	-
Female	85	45	-	-
Total	180	132	-	6305⁴

Notes:

1. Total hours of training completed by employees.
2. In 2025, the External Manager reported only those training hours attributable to Continuous Professional Development (CPD) units mandated by CySEC. Accordingly, the year-on-year discrepancy should be understood as a change in data collection methodology rather than a reduction in the training actually provided.
3. The dash (-) is used to indicate that there is no available information and should not be assumed to equate to zero.
4. No disaggregated information on training hours by gender could be obtained for the reporting period.

ESG TRAINING

To uphold our high sustainability standards, our Senior Management and personnel regularly participate in training sessions on ESG-related topics. These sessions are vital for ensuring that we remain informed of the latest regulatory developments and industry best practices.

By investing in the continuous education of our employees on such strategically important matters, we strengthen their knowledge, skills, and capabilities, supporting their long-term professional growth and development.

The ESG Champions support internal coordination on sustainability-related matters, ESG integration initiatives, regulatory developments and sustainability-related monitoring processes across the Group. Both ESG Champions completed Sustainable Investing programmes at Harvard Business School in 2023 and continue to monitor relevant regulatory and industry developments relating to sustainability, ESG integration and responsible investment practices.

EMPLOYEE WELLBEING

As part of our commitment to supporting the physical wellbeing of our workforce our employees are provided with access to an on-site exercise area located within the premises, offering a convenient facility to support health and fitness alongside their working routine.

The provision of on-site exercise facilities forms part of the Group's ongoing efforts to promote employee welfare and contribute to a culture of physical and mental wellbeing across the organisation.

HEALTH AND SAFETY

Pelagic Partners recognises its responsibility to ensure the health and safety of its workforce throughout the Group. This commitment includes maintaining regular communication between management, office employees and crew personnel, continually reviewing health and safety protocols, and thoughtful additions to employee benefits aimed at fostering a supportive work environment.

To support these efforts, the Group's Emergency Evacuation Plan has been revised following the relocation of the External Managers, ensuring that updated procedures reflect the new operational arrangements and that all personnel are adequately prepared in the event of an emergency.

The following table presents information regarding the number of hours worked in the year by all employees of the Group along with number of work-related accidents and fatalities occurred in the year, in relation to work-related injuries and health issues among its workforce.

The provision of on-site exercise facilities forms part of the Group's ongoing efforts to promote employee welfare and contribute to a culture of physical and mental wellbeing across the organisation.

HEALTH AND SAFETY

DESCRIPTION	EXTERNAL MANAGER		INVESTMENT FUND	
	2024	2025	2024	2025
Total number of hours worked in a year by all employees	19,200	87	-	575,479
Number of work-related accidents in the year	0	0	-	5
Number of fatalities as a result of work-related injuries and work-related ill health	0	0	-	-
Rate of recordable work-related accidents¹	0	0	-	1.74

Notes:

1. The rate of recordable work-related accidents has been calculated as follows: (Number of work related accidents in the year / Total number of hours worked in a year by all employees) x 200000

As per the VSME, the factor of 200,000 standardises the rate to the equivalent of 100 full-time employees working 40 hours per week for 50 weeks a year, allowing for comparable disclosures.

2. The dash (-) is used to indicate that there is no available information and should not be assumed to equate to zero.

5.2 ONBOARD CREW MEMBERS (C2, C5)

MEASURES AGAINST VIOLENCE AND HARASSMENT IN THE WORKPLACE

Further to our initiatives concerning our own workforce, the Group has implemented a range of safeguards to protect contracted crew members. While onboard crew are employed and managed by our appointed ship managers rather than directly by Pelagic Partners, we remain committed to ensuring that our standards and principles are upheld across vessel operations through contractual oversight and regular monitoring.

We continuously strive to improve working conditions on board through regular assessments, enhancements in health and safety practices, and open communication channels between crew and management. Through these collective efforts, we aim to foster a safe working environment on all our vessels, adhering to best employment practices, and promoting sustainable long-term employability.

The Group's ship managers maintain and uphold several policies that reinforce a commitment to a safe and responsible working environment for all crew onboard. The Group aligns itself with these standards and has satisfied itself that its partners have such policies in place.

The Drug and Alcohol Policy aims for zero drug and alcohol content among all seafarers, including contractors and visitors aboard Group vessels. This policy mandates that all seafarers undergo drug and alcohol tests before boarding a vessel, at unannounced intervals, and following any accident or incident.

The applicable Security Policy that the Group has in place, is also designed to support the creation and maintenance of a secure working environment for all employees and contractors, safeguarding people, assets, and operations against risks of injury, loss, or damage from criminal, hostile, or malicious acts.

Moreover, the Stop Work Authority Policy fosters an environment free from harassment, bullying, and victimisation, empowering all crew members, contractors, and visitors to halt any unsafe work operation or behaviour that could lead to injury.

WORK-LIFE BALANCE

Our commitment to crew welfare extends beyond mere safety measures; it encompasses overall well-being, and quality of life at sea. Through our ship managers, we promote crew well-being by offering essential amenities and support systems designed to enhance the seafaring experience. This includes high-speed Wi-Fi to stay connected with family and friends, fully-equipped gyms to maintain fitness, and a Welfare Fund to support various activities and individual needs. Our comprehensive health initiatives also include 24/7 medical support, health risk assessments, nutrition monitoring, and health insurance coverage for crew members and their families.

5.3 EXTERNAL STAKEHOLDERS AND AFFECTED COMMUNITIES (B2, C1)

SOCIAL INITIATIVES

Pelagic Partners' commitment to social responsibility extends beyond its own workforce and crew members to encompass the broader communities in which it operates. As part of its annual festive gift to collaborators and partners, the Group selected two wines from Zambartas Winery, a family-run estate located in Agios Amvrosios, Limassol. This initiative reflects Pelagic Partners' dedication to preserving cultural heritage through the support of local winemakers, while also contributing to the recovery of communities affected by the July 2025 wildfires that swept through the region.

The fires caused significant damage to vineyards and livelihoods, impacting numerous families and producers, including Zambartas, and leaving a lasting mark on the local economy and landscape. Through deliberate procurement choices such as these, Pelagic Partners seeks to channel its purchasing power towards meaningful social impact, supporting community resilience and the restoration of local industries.

STRENGTHENING PARTNERSHIPS

Following the relocation to its new offices, the Group hosted an Open House event in October 2025, welcoming all collaborators and partners. The event was designed to strengthen relationships with key stakeholders and to express the Group's appreciation for those who contribute to and enable its operations.

The Open House also provided an opportunity for employees to engage directly with external partners in an informal setting, fostering a sense of shared purpose and reinforcing the collaborative culture that underpins the Group's day-to-day activities. By bringing its workforce together with its wider network of collaborators, Pelagic Partners demonstrated its commitment to creating an inclusive and connected working environment that values the contributions of all parties involved.

Governance



At Pelagic Partners we acknowledge that overall operational success relies on strong governance. In this respect, the effectiveness of our sustainability initiatives is largely contingent on sound governance structures and practices.

Beyond enabling us to meet our operational needs, we also recognise that strong governance is fundamental to ensuring compliance with international standards and fulfilling regulatory requirements.

Enforcing Group-wide policies on a range of ethical and legal matters is a key component to maintaining strong governance across our operations. This section of the Report discloses relevant policies to achieving this aim.

While the Investment Fund is classified under Article 6 of the SFDR, Pelagic Partners, as a Group, continues strengthening governance and remains committed to aligning our efforts with SDG 16 and SDG 17.

The topics presented in this section are associated with the following SDGs:



Governance Topics

6.1 Business Conduct

6.1 BUSINESS CONDUCT (B11, C2)

PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

At Pelagic Partners we are committed to maintaining the highest standards of corporate governance and transparency. We have devised and implemented a comprehensive set of policies designed to guide ethical conduct, ensure regulatory compliance, and uphold accountability across all levels of operation.

To ensure proper standards of conduct, the Group has a Gifts, Gratuities and Entertainment Policy in place that governs the offering, acceptance and exchange of gifts, hospitality and other benefits in a business context. Outlined in the Employee Guidelines, this policy sets out the distinction between permissible and non-permissible gifts and gratuities, and reinforcing the expectation that employees must always act with integrity and exercise sound judgement. Employees are prohibited from offering, authorising or accepting any payment, gift or other benefit that is intended, or could reasonably be perceived, to improperly influence a business decision, secure an advantage or compromise professional independence. By adhering to these standards, the Group strives to foster a culture of integrity and trust, reinforcing its dedication to ethical operations and sustainable growth.

The Group's performance in this area is continuously monitored, reflecting its determination to uphold ethical business practices and ensure full communication of its governance policies.

The Group's Ethical Governance Manual is designed to uphold transparency, integrity, and compliance with the Cyprus Securities and Exchange Commission ("CySEC") regulations. By adhering to industry best practices, this policy promotes responsible business conduct and risk management through diligence and robust control systems. It prioritises the



protection of investors' interests by ensuring financial prudence, proper market conduct, and fair management of conflicts of interest. Through open communication and collaboration with regulatory authorities, the policy strengthens stakeholder trust and mitigates the risk of corruption.

We are proud to report that for 2025, we had zero monetary losses and incidents related to bribery and corruption, for both the External Manager and the Investment Fund.

WHISTLEBLOWER PROTECTION

Speaking-up is recognised as an essential part of upholding ethical standards across Group policies, allowing individuals to report concerns about health, safety, or compliance issues without fear of reprisal. This approach supports transparency and accountability within the organisation, ensuring that any reported issues are promptly addressed in line with legal and regulatory requirements. By fostering an environment where employees feel secure in reporting concerns, we strengthen our commitment to industry best practices and the integrity of its operations. This is formalised in the Employee Guidelines which states that employees acting in good faith will not be subject to retaliation for reporting concerns or potential misconduct.

6.1 CONFLICT OF INTEREST

As part of its Ethical Governance Manual, the Group maintains a Conflicts of Interest Policy to ensure that all decisions are taken in the best interests of investors. Procedures are in place to identify, document, and manage potential conflicts, including those that may arise from related-party transactions or overlapping commercial interests. Where conflicts cannot be avoided, they are disclosed in line with regulatory requirements.

BOARD SUITABILITY

Pelagic Partners has voluntarily adopted the suitability assessment framework set out in the joint European Banking Authority (EBA) and European Securities and Markets Authority (ESMA) guidelines. The assessment, carried out on a bi-annual basis, evaluates the collective knowledge, skills, experience, independence, and diversity of the Board, ensuring it remains fit to oversee the Group's activities and meet evolving regulatory expectations.

BUSINESS CONTINUITY

Pelagic Partners has developed a Business Continuity Plan ("BCP") that outlines procedures to safeguard operations in the event of significant disruptions, such as ICT incidents, natural disasters, or other emergencies. The BCP is designed to ensure continuity of critical functions, minimise downtime, and maintain compliance with regulatory obligations. The plan is reviewed regularly, tested on a periodic basis, and updated as necessary to reflect changes in operations, technology, and regulatory requirements.

REPLACEMENT

The Group's Replacement Policy is vital for workforce protection and operational continuity, especially in the event of the departure of key personnel or unforeseen vacancies. By establishing clear procedures and guidelines, the policy ensures that critical functions are swiftly assumed by qualified individuals, thereby minimising disruptions and maintaining regulatory compliance. It mitigates the risk of a single point of failure by identifying potential successors, facilitating knowledge transfer, and preserving essential expertise within the Group. This proactive approach not only enhances our governance and resilience but also bolsters stakeholder confidence, demonstrating our commitment to succession planning and our readiness for personnel changes.



6.1 ICT GOVERNANCE

Our commitment to digital operational resilience in the face of an evolving cyber threat landscape is reflected in a set of interconnected ICT governance policies, developed in alignment with the Digital Operational Resilience Act (“DORA”) and the General Data Protection Regulation (“GDPR”), as applicable. The ICT Risk Management Policy establishes a structured approach to identifying, assessing, and mitigating risks associated with our information assets and ICT systems, ensuring that potential vulnerabilities are proactively addressed and managed in line with our broader risk appetite.

Complementing this, our Information Security Policy fortifies our defences against both cyber and physical threats by setting out robust safeguards across our critical functions. Through stringent access controls, encryption standards, network security measures, and ongoing awareness training for all personnel, we ensure that the confidentiality, integrity, and availability of our information assets are consistently upheld.

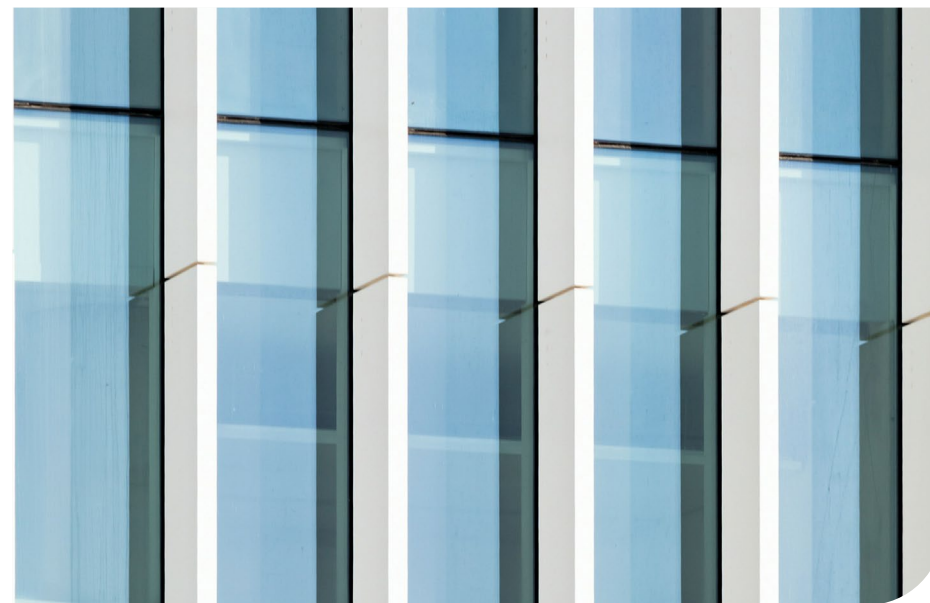
In the event of an ICT-related incident, our Incident Management Policy provides a clear and structured framework for the prompt identification, classification, response, and resolution of such events.

SANCTIONS AND MARITIME SECURITY COMPLIANCE

At Pelagic Partners we are committed to refraining from engaging in any transactions that aim to evade or violate sanctions imposed by governments, international, and supranational bodies. All business activities are screened and approved in line with our internal procedures to avoid any risk of sanctions. Additionally, we strive for all employees to be well-informed about these sanctions and understand our compliance procedures and obligations, reinforcing our dedication to adherence and integrity in all operations.

ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING

The Group is firmly committed to preventing its operations and services from being used for money laundering, terrorist financing, or any other form of financial crime. To this end, the Group maintains a comprehensive Risk and Procedures Manual for the Prevention of Money Laundering and Combat of Terrorist Financing (the “AML Manual”), developed in compliance with the Prevention and Suppression of Money Laundering Activities Law 188(I)/2007-2021, the CySEC AML Directive, and the broader EU AML framework.



Appendix

8



BASIC MODULE – GENERAL INFORMATION

- B1** Basis for Preparation
- B2** Practices, policies and future initiatives for transitioning towards a more sustainable economy

BASIC MODULE – ENVIRONMENTAL METRICS

- B3** Energy and greenhouse gas emissions
- B5** Biodiversity
- B6** Water
- B7** Resource use, circular economy and waste management

BASIC MODULE – SOCIAL METRICS

- B8** Workforce – General characteristics
- B9** Workforce – Health and safety
- B10** Workforce – Remuneration, collective bargaining and training

BASIC MODULE – GOVERNANCE METRICS

- B11** Convictions and fines for corruption and bribery

COMPREHENSIVE MODULE – GENERAL INFORMATION

- C1** Strategy: Business Model and Sustainability – Related Initiatives
- C2** Description of practices, policies and future initiatives for transitioning towards a more sustainable economy

COMPREHENSIVE MODULE – ENVIRONMENTAL METRICS

- C3** GHG reduction targets and climate transition
- C4** Climate risks

COMPREHENSIVE MODULE – SOCIAL METRICS

- C5** Additional (general) workforce characteristics

DEFINED TERM	VSME STANDARD DEFINITION
Actions	Actions refer to (i) actions and actions plans (including transition plans) that are undertaken to ensure that the undertaking delivers against targets set and through which the undertaking seeks to address material impacts, risks and opportunities; and (ii) decisions to support these with financial, human or technological resources.
Biodiversity Sensitive Area	Biodiversity sensitive areas include: Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139.
Business Conduct	The following matters are collectively referred to as 'business conduct or business conduct matters': (a) business ethics and corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers, and animal welfare; (b) the management of relationships with suppliers, including payment practices, especially with regard to late payment to small and medium sized undertakings. (c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities.
Corruption	Abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.
Circular Economy Principles	The European circular economy principles are usability; reusability; repairability; disassembly; remanufacturing or refurbishment; recycling; recirculation by the biological cycle; other potential optimisation of product and material use.
Climate Change Adaptation	The process of adjustment to actual and expected climate change and its impacts.

DEFINED TERM	VSME STANDARD DEFINITION
Direct GHG Emissions (Scope 1)	Direct GHG emissions from sources that are owned or controlled by the undertaking.
Employee	An individual who is in an employment relationship with the undertaking according to national law or practice.
Greenhouse Gases (GHG)	For the purposes of this Standard, GHGs are the six gases listed in the Kyoto Protocol: carbon dioxide (CO ₂); methane (CH ₄); nitrous oxide (N ₂ O); Nitrogen trifluoride (NF ₃); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF ₆).
Governance	The governance is the system of rules, practices and processes by which a company is directed and controlled.
Greenhouse Gases (GHG)	Gross greenhouse gas (GHG) emissions are total GHG emissions released by the undertaking into the atmosphere, without considering any deductions for carbon removals or other adjustments.
Hazardous Waste	Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC of the European Parliament and of the Council on waste.
Incident	A legal action or complaint registered with the undertaking or competent authorities through a formal process, or an instance of non-compliance identified by the undertaking through established procedures. Established procedures to identify instances of non-compliance can include management system audits, formal monitoring programs, or grievance mechanisms.
Indirect GHG Emissions (Scope 2)	Indirect emissions are a consequence of the operations of the undertaking but occur at sources owned or controlled by another company. Scope 2 GHG emissions are indirect emissions from the generation of purchased or acquired electricity, steam and heat, or cooling consumed by the undertaking.
Impact	Impact refers to the effect an organisation has or could have on the economy, environment, and people, including effects on their human rights, as a result of the organisation's activities or business relationships. The impacts can be actual or potential, negative or positive, short-term or long-term, intended or unintended, direct or indirect, and reversible or irreversible. These impacts indicate the organization's contribution, negative or positive, to sustainable development. The impacts on the economy, environment, and people are interrelated.

DEFINED TERM	VSME STANDARD DEFINITION
Own Workforce / Own Workers	Employees who are in an employment relationship with the undertaking ('employees') and non-employees who are either individual contractors supplying labour to the undertaking ('self-employed people') or people provided by undertakings primarily engaged in 'employment activities' (NACE Code N78).
Pay	The ordinary basic or minimum wage or salary and any other remuneration, whether in cash or in kind which the worker receives directly or indirectly ('complementary or variable components'), in respect of his/her employment from his/her employer. 'Pay level' means gross annual pay and the corresponding gross hourly pay. 'Median pay level' means the pay of the employee that would have half of the employees earn more and half less than they do.
Policy	A set or framework of general objectives and management principles that the undertaking uses for decision-making. A policy implements the undertaking's strategy or management decisions related to a sustainability issue. Each policy is under the responsibility of defined person(s), specifies its perimeter of application, and includes one or more objectives (linked when applicable to measurable targets). A policy is implemented through actions or action plans.
Recordable Work-Related Accident / Recordable Work-Related Injury or Ill health	A work-related accident is an event that leads to physical or mental harm therefore to injury or ill health. It happens whilst engaged in an occupational activity or during the time spent at work. Recordable means diagnosed by a physician or other licensed health care professionals. Work-related injury or ill health can result in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or loss of consciousness. Injuries that do not require medical treatment beyond first aid are generally not recordable.
Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.
Renewable Energy	Energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas.
Training	Initiatives put in place by the undertaking aimed at the maintenance and/or improvement of skills and knowledge of its own workers. It can include different methodologies, such as on-site training, and online training.
Wage	Gross wage, excluding variable components such as overtime and incentive pay, and excluding allowances unless they are guaranteed.



2025 SUSTAINABILITY REPORT

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