



Dee4 Capital Partners ApS: ESG Policy

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Introduction

Dee4 Capital Partners ApS (Dee4 Capital) firmly believes in the need to invest responsibly and our ability to drive sustainable financial returns while positively impacting society and the environment. We aim to build the best maritime investment platform in the market whilst the Dee4 name should be regarded as synonymous with "Quality Shipping".

ESG is one of Dee4 Capital's core values, which are (in full):

- **D**ynamism; in the ever-changing maritime environment, we adapt for our customers; we deliver on our promises; we deliver for our investors and partners;
- **E**mpathy; we understand the needs of our customers; we are trustworthy and fair, and act in our customers' interests;
- **E**SG-focus; we have a safety-first culture; we limit emissions and waste; we are transparent and act with integrity;
- **4**-titude; we find solutions; we persevere in all that we do

As such, this policy serves as a cornerstone to guide Dee4 Capital's commitment to integrating environmental, social, and governance (ESG) considerations into all aspects of its operations. It outlines the principles and framework that drive the comprehensive integration of ESG factors into the investment process, governance procedures, and stakeholder engagements.

This policy reflects Dee4 Capital's commitment to responsible investing, safety, sustainability, transparency, and integrity, aligning the company's values with the interests of its stakeholders.

Environmental Commitment

Emissions and energy efficiency

The world faces an urgent problem generated by excessive production of greenhouse gases. Roughly 3% of global carbon emissions are generated by the global shipping industry

Dee4 Capital is committed to reducing its CO₂ footprint. One ton of fuel is saved money for the owners or charterers and also saves 3.1 tons of CO₂ emissions. Doing good for the environment also makes good economic sense.

We are members of the Danish Shipowners' Association (Danske Rederier), which has stated targets of achieving Net Zero in shipping by 2050 without relying on carbon offsetting and which we fully support. We believe achieving lasting change is critical and must be achieved by a combination of measures. One is building new, more efficient vessels which operate on low or zero carbon fuels. But there are over 100,000 commercial vessels currently in operation and we cannot sensibly replace all of those in the near term. So we must also focus on reducing the environmental impact of the current fleet. Dee4 is committed to achieve this through its bespoke Fuel Efficiency Programme.

We will invest in vessels we consider to be fuel-efficient for their vintage and we will achieve savings through the way we run them. Examples include:

- Hull treatment/ anti-fouling paint
- Propeller polishing
- Crew actions
- Data monitoring

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We will further seek out investment opportunities which enable CO₂ reduction.

Objective 1: to invest in assets which we can improve or which are in the top quartile for relative fuel efficiency and maintain them appropriately.

Objective 2: to demonstrate in reports to our stakeholders any improvements to energy efficiency which we have made.

Pollution control

Recognising the environmental damage caused by pollutants such as sulphur oxides (SO_x), nitrogen oxides (NO_x), and particulate matter (PM), we are committed to adhering to international regulations such as MARPOL Annex VI to control and reduce emissions. We will continue to explore and potentially invest in cleaner fuels and innovative technologies that will further decrease our environmental footprint.

In parallel, we actively encourage a culture of safety and prevention of incidental pollution as well as strict adherence to pollution regulations.

Objective 3: to achieve zero incidents or spills to water.

Waste Management

All vessels will prioritise waste reduction, segregation, and proper disposal. Recycling will be encouraged, and single-use plastics will be minimized. Our third-party technical manager will actively collaborate with suppliers and partners to encourage and enhance environmental responsibility.

In Dee4's office, we will seek to generate a minimum of waste and recycle where possible.

Objective 4: to minimise the waste generated from Dee4's office and to recycle where possible.

Biodiversity

We will strive to minimise our impact on marine ecosystems. This involves preventing invasive species transmission through careful management of ballast water and hull fouling. We adhere to the guidelines set forth by the IMO and other relevant authorities to protect biodiversity.

Objective 5: to work with vessels to recognise sensitive or protected areas and navigate accordingly.

Social Commitment

Employee Welfare

Crew welfare and safety are paramount for Dee4 Capital. Our employees, both on land and at sea, are the backbone of our operations. We ensure that our working conditions meet or exceed international labour standards. This includes proper rest periods, safe working conditions, access to healthcare, and fair compensation.

We believe we have a responsibility to provide opportunities for employment and education for young people and do so both on our fleet (cadetships) and in our office (internships).

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We actively encourage a culture of safety and prevention of incidents and accidents. We do this by a combination of daily relations with our third-party management providers and our vessels, by regularly attending the vessels to physically meet the officers and crew and by video-based meetings with new Masters before they sign on our vessels.

This may take the form of *inter alia* crew social activities budgets, internet access, diverting vessels or arranging transportation if required to achieve crew changes.

We are signatories to the Neptune Declaration on Seafarer Welling and Crew Change.

Objective 6: to act such that crew members actively want to sail on and return to Dee4 vessels.

Objective 7: to maintain zero fatalities and zero permanent harm to any crew members serving on Dee4 vessels and achieve an LTIF which is at or better than industry average.

Objective 8: to actively engage with our crews and our third-party technical managers to encourage and nurture a safety-first culture where everybody gets home safely from work.

Stakeholder Engagement

We are committed to maintaining strong relationships with our customers by providing safe, reliable, and responsible shipping services. We engage in regular dialogue with our customers to understand their needs and expectations, and we strive to exceed these through continuous improvement of our services.

We will closely collaborate with industry bodies, such as Danish Shipping to understand changing regulations and provide ideas.

Objective 9: to regularly communicate with customers to understand their needs or any concerns.

Objective 10: to remain acceptable to energy companies for SIRE inspections and to meet requirements of local Port State Control inspection regimes/ not have any vessels detained.

Diversity and Inclusion

We strongly believe the best person should be hired for each position, irrespective of their diversity. We will foster a workplace culture that promotes diversity, equity, and inclusion.

Objective 11: to have zero complaints regarding diversity or inclusion.

Governance Commitment

At the core of our governance structure are our Board of Directors, our Investor Panel and our Investment Advisory Committee, comprising a diverse group of individuals with a wealth of experience particularly in the shipping industry.

Our Board of Directors exercises its oversight role diligently, ensuring that our company's strategic direction is clear, sustainable, and responsive to changing market and regulatory conditions. Meetings are held regularly and communication is open with management, employees, and stakeholders to understand all perspectives and ensure alignment with the company's goals and objectives.

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The Investment Advisory Committee plays a crucial role in our decision-making process. A key aspect of their responsibility is to ensure that ESG considerations are thoroughly assessed and integrated into every investment decision. By doing so, we emphasise the importance of upholding our values and guaranteeing that ESG factors are adequately reflected in each case.

The Investor Panel is primarily responsible for evaluating potential conflicts of interest which may occur in the day-to-day business of Dee4 Capital.

Our management team holds the vital responsibility of implementing and adhering to industry standards across our operations. The team is dedicated to upholding these standards and ensuring our company's compliance with applicable regulations and guidelines.

Objective 12: to run Dee4 in a manner that is consistent with the governance criteria of a publicly listed company.

Ethical Conduct

Adhere to the highest standards of ethical conduct in all business dealings.

From an operational perspective, Dee4 Capital has a zero tolerance approach to bribery and corruption and we say no to facilitation payments. We proudly demonstrate our commitment through our membership of the Maritime Anti-Corruption Network.

Objective 13: to achieve zero incidents of bribes, corruption or facilitation payments across the portfolio.

Transparency

Dee4 operates under a high level of transparency and accountability. We publish annual reports detailing our operations and financial performance, and publish quarterly reports to investors outlining sustainability initiatives. We believe that providing this information fosters trust and allows our stakeholders to make informed decisions about our company.

We also adhere to the stringent reporting requirements of the jurisdictions in which we operate and are committed to timely disclosure of any material business developments. In addition, we undergo regular audits conducted by external and independent auditors to ensure the integrity of our financial reports and internal control systems.

Objective 14: to include ESG performance data in quarterly investor reports and the annual sustainability statement.

Continuous Improvement

We will seek to regularly review both ESG performance and policies and objectives in connection with this, thereby ensuring that we stay at the forefront of sustainable practices in the shipping industry.

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Objectives summary

Objective	Description	Metrics/ criteria
1	To invest in assets which we can improve or which are in the top quartile for relative fuel efficiency and maintain them appropriately	Vessels classified as A-C on CII scale, or to improve CII performance by at least one grade
2	To demonstrate in reports to our stakeholders any improvements to energy efficiency which we have made	Fuel-efficiency pre- and post-actions
3	To achieve zero incidents or spills to water	Zero incidents
4	To minimise the waste generated from Dee4's office and to recycle where possible	Subjective/ report on examples
5	To work with vessels to recognise sensitive or protected areas and navigate accordingly	Subjective/ report on examples
6	To act such that crew members actively want to sail on Dee4 vessels	Subjective feedback
7	To maintain zero fatalities and zero permanent harm to any crew members serving on Dee4 vessels and achieve an LTIF which is at or better than industry average	Zero fatalities and permanent harm LTIF < industry average
8	To actively engage with our crews and our third-party technical managers to encourage and nurture a safety-first culture where everybody gets home safely from work	Subjective feedback/ report on examples
9	To regularly communicate with customers to understand their needs or any concerns	Subjective
10	To remain acceptable to energy companies for SIRE inspections and to meet requirements of local Port State Control inspection regimes/ not have any vessels detained	SIRE < 5 obs PSC nil deficiencies
11	To have zero complaints regarding diversity or inclusion	Zero complaints
12	To run Dee4 in a manner that is consistent with the governance criteria of a publicly listed company	Maintain governance structure
13	To achieve zero incidents of bribes, corruption or facilitation payments across the portfolio	Zero incidents
14	To include ESG performance data in quarterly investor reports and the annual sustainability statement	Inclusion in quarterly report

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Contact details

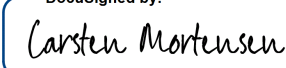
We are registered in Denmark under registration number 40420207, and our registered office is at Amaliegade 33, 1256 Copenhagen.

Our principal place of business is at Amaliegade 33, 1256 Copenhagen.

You can contact us:

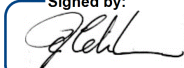
- a) by post, to the postal address given above;
- b) using our website contact form; or
- c) by email, using the email address published on our website.

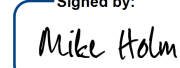
Approved by the Board of Directors, 15th August 2024

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