



TIGM
TOP GLORY MARINE

20
24

SUSTAINABILITY
REPORT





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01

ABOUT THIS REPORT

This is the TGM 2024 annual Sustainability Report which highlights our efforts to create positive environmental and social impact using the Global Reporting Initiative (GRI) Standards as guidelines. Please refer to the GRI Content Index for a complete list of disclosures mentioned in this report.

Scope and boundary

The information presented in this report concerns the period from 1st January 2024 to 31st December 2024 and includes all the operations of TGM. The report discloses information, to the extent necessary, that assists in understanding the development, performance, position and impact of TGM's operations, in relation to environmental, social and governance (ESG) issues such as the protection of natural resources, respect for human rights, and the fight against corruption and bribery

matters. Sustainability refers to the activities of TGM that aim to make a positive contribution to the economy, society, the environment and its interested parties (stakeholders).

TGM is managing the material issues that arise from the Sustainability Report by applying a precautionary approach, which is implemented through its organizational structure, internal processes and the sustainability action plans on which it focuses.

Top Glory Marine is the sole entity included in this Sustainability Report.



02

LETTER FROM THE CEO

We are proud to present our efforts for 2024, through which we aim to promote growth by making meaningful contributions to sustainability and society. In 2024, our business activities continued to focus on a strong commitment to environmental protection. In this spirit, TGM adheres to the highest environmental and quality standards.

Once again, we have entered into a partnership with the innovative Everwave project to help offset the plastic waste generated in our offices. Through this collaboration and the purchase of plastic emission certificates, we have helped remove significant amounts of waste from waters in Europe and Southeast Asia. Our commitment to Everwave remains strong, and we are seeking to expand our partnerships with other forward-thinking organisations to increase our impact beyond plastic waste or to promote environmental protection in general, as we have already done in our collaboration on the NearBees project by acquiring our own company beehive this year.

While the shipping industry has taken important steps to reduce its environmental footprint, we continue to refine our practices to align them with

the principles of the circular economy. There is still significant potential for improvement in marine waste management, and we are determined to take a leading role in this area.

We also recognise the crucial role of coordinated action and support from the public sector – through policy, infrastructure and incentives – in achieving sustainability goals.

Although environmental protection is a key priority, we know that our employees and partners are our greatest asset. We therefore focus on governance practices that uphold human rights and promote ethical, inclusive business conduct. We invite you to read this year’s ESG report, which reflects our ongoing journey to strengthen our sustainability efforts and build a resilient foundation for the future.

Silke Fehr & Cathrin Prikker
Managing Directors



03

KEY HIGHLIGHTS



100%
of Suppliers screened using environmental criteria and assessed for environmental impacts



0
suppliers identified as having significant and/or potential negative environmental impacts



81,25%
of employees are female



0
accidents and work-related injuries or ill health



0
incidents of corruption



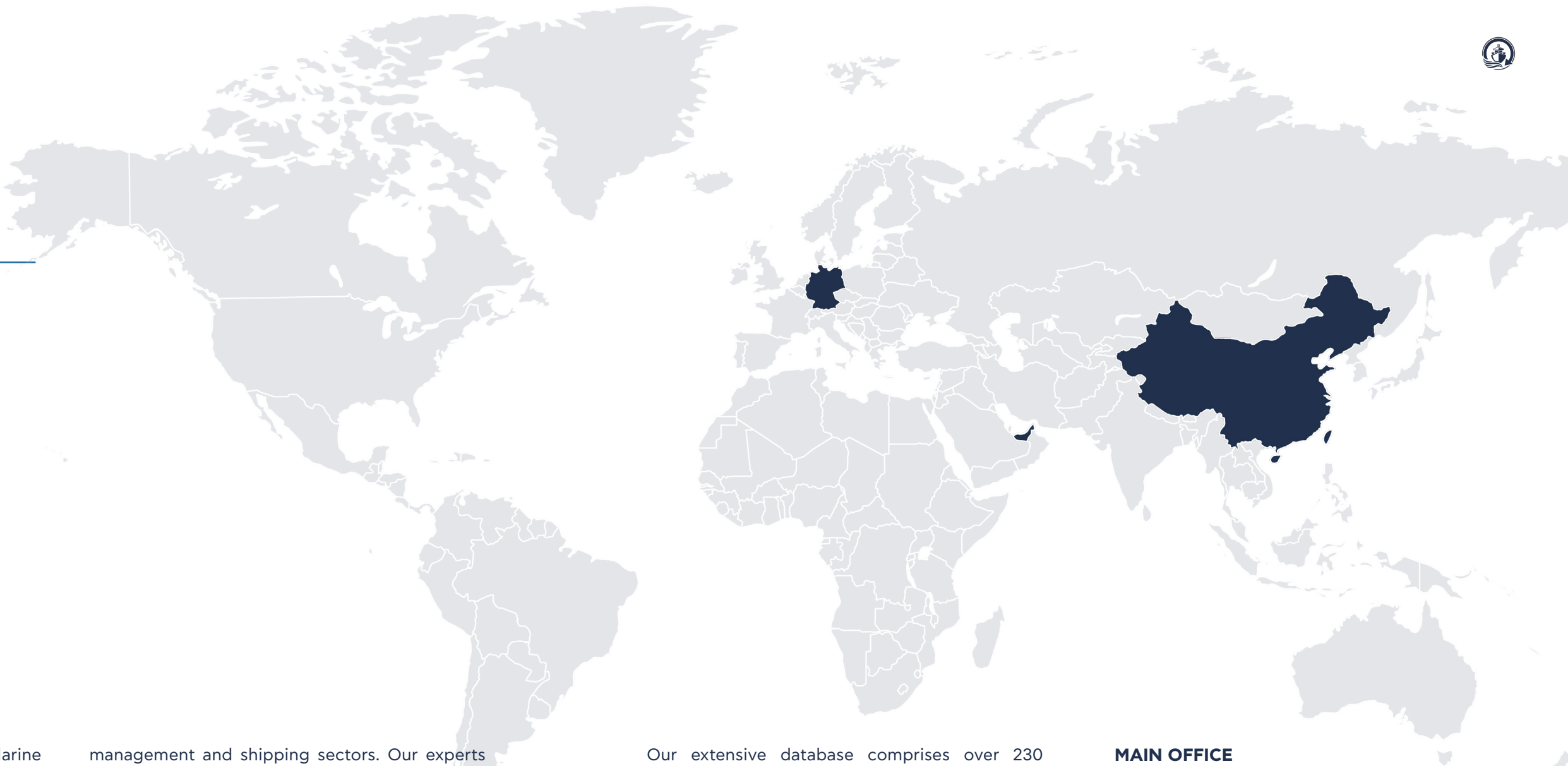
100%
of procurement budget spent on local suppliers





04

OUR COMPANY



Founded in 2013 in Oldenburg, Top Glory Marine Service GmbH & Co. KG is the platform provider for ship’s waste management worldwide.

TGM caters to ship managers and ship owners engaged in global trade, providing sustainable services for various types of seagoing vessels. Our objective is to consider the entire waste management cycle and involve all relevant stakeholders. We tailor offload strategies for our clients’ fleets based on their ship schedules, addressing all waste streams generated onboard. This approach ensures efficient and cost-effective disposal methods. Moreover, our platform’s strong market presence enables us to negotiate lower fees for sludge and garbage disposal in ports, benefiting our customers.

We operate in two main offices in Hamburg and Tianjin and a representative office in Dubai. Having established our offices in strategic locations enables us to provide services to our clients within similar time zones and support their fleet globally while adapting to local strategies.

management and shipping sectors. Our experts are strategically located in five offices, which are based in the key trading regions of our valued clients. With a strong commitment to meeting their specific needs and overcoming daily obstacles, our team tirelessly works to ensure the satisfaction of our clients.

At TGM, we deeply appreciate the significance of our team members, as they are the cornerstone of our organization’s distinction, showcasing unwavering professionalism and motivation. The diverse range of qualities possessed by our personnel serves as the catalyst for the ongoing enhancement of our services.

Our HSEQ department conducts routine audits of the waste management companies involved. Through these audits, we establish a real-time ranking of preferred suppliers based on their successful track record of providing services in benchmarked ports. This ensures that we always provide the best disposal company for our needs.

Our extensive database comprises over 230 disposal companies specializing in MARPOL relevant waste streams and tank cleaning services. These services are available in over 400 ports, offering a wide range of options for efficient and reliable waste management solutions.

As our network of waste disposal companies in global ports continues to expand, we are consistently serving over 550 ships on a regular basis. Our top priority is to uphold the highest standards in waste management, ensuring that our customers receive comprehensive documentation and real-time analysis of offloaded waste streams. By prioritizing transparency and efficiency, we strive to provide our customers with a seamless experience while meeting their waste disposal needs.

MAIN OFFICE

- 📍 Top Glory Marine Service GmbH & Co. KG (Germany)
c/o ABC Workspace, Georgsplatz 1, 20099 Hamburg, Germany
- ☎ +49(0)40-609232-02
- ✉ info@topglorymarine.de

- 📍 7 HongTai Building, No. 26 JiedaLu BinHai
New Area, Tianjin China
- ☎ +86-158-2259-3938
+86-136-0206-5908
- ✉ ops@topglorymarine.com

REPRESENTATIVES

- 📍 Dubai



04

OUR COMPANY SERVICES

1) Global solutions for green maritime waste management

- **Sludge disposal (MARPOL Annex I):** At TGM, we prioritize affordability, efficiency, and safety when it comes to sludge disposal services for our valued customers. Our unwavering dedication lies in safeguarding the marine ecosystem by completely eradicating oil and other harmful substances that pose a threat to the environment. Additionally, we strive to minimize the risk of unintended discharge of these elements, ensuring a responsible approach to waste management.
- **Garbage disposal (MARPOL Annex V):** We offer a range of garbage disposal services for various types of waste in compliance with MARPOL Annex V. According to MARPOL Annex V, garbage encompasses a wide range of items such as food waste, household waste, operational waste, plastics, cargo residues, incinerator ashes, cooking oil, fishing gear, and animal carcasses. These waste materials are generated during the regular operation of the ship and require continuous or periodic disposal.
- **Special waste (e.g., asbestos containing**

material): TGM specializes in the safe disposal of various types of special waste, which includes asbestos-containing materials, expired pyrotechnics, metal scrap, and more. We ensure that these hazardous materials are handled and disposed of in accordance with the highest safety standards and regulatory requirements. Our expertise in handling such waste allows us to provide reliable and responsible solutions for the proper disposal of these specialized materials.

- **Slop disposal (MARPOL Annex I and II) Oily and chemical washings:** We offer comprehensive slop disposal services for oily and chemical washings, strictly adhering to the guidelines outlined in MARPOL Annex I and II. Our primary objective is to eliminate any potential pollution caused by oil and other harmful substances. We are deeply committed to minimizing the risk of accidental discharge and take proactive measures to ensure the responsible handling and disposal of these elements. By prioritizing environmental protection, we strive to contribute to a cleaner and safer ecosystem.

- **Sewage disposal (MARPOL Annex IV):** TGM offers sewage disposal services in strict compliance with the guidelines set forth in MARPOL Annex IV. Our commitment lies in adhering to Annex IV regulations, which strictly prohibit the discharge of sewage into the sea within a designated distance from the nearest land, unless ships have a duly approved sewage treatment plant in operation. By upholding these standards, we contribute to the preservation of marine environments and ensure the responsible management of sewage waste.
- **Disposal of exhaust gas cleaning residues / Scrubber sludge (MARPOL Annex VI):** TGM offers exhaust gas cleaning residue and scrubber sludge disposal services in strict accordance with MARPOL Annex VI. This regulation sets limits on the main air pollutants found in ships' exhaust gas, specifically targeting sulphur oxides (SOx). By complying with these guidelines, we ensure the proper management and disposal of exhaust gas cleaning residues, playing our part in reducing air pollution and safeguarding the environment.
- **Debunkering:** We specialize in offering debunkering solutions to extract non-compliant fuel or off-spec fuel from vessels originally intended for sailing. The classification of this bunker fuel varies depending on the specific circumstances. In certain cases, it may be categorized as waste, while in others, it can be classified as a product.

2) SPRO specialists

As of March 1, 2020, China's Maritime Safety Agency (MSA) introduced new regulations concerning the Agreement for Ship Pollution Response Regime and the Directory of Hazardous Bulk Liquid Cargo Apt to Cause Pollution. These measures require the deployment of oil booms during cargo operations or the establishment of an agreement with a Ship Pollution Response Organization (SPRO).

This is a revision of a 2015 mandate that applies to owners and operators of the following:

- Any ship transporting polluting and hazardous cargoes in bulk.
- Any ship with a gross tonnage (GT) exceeding 10,000.

Before a ship enters a seaport in the People's Republic of China (PRC) or engages in activities such as loading, discharge, or ship-to-ship transfers within 20 nm offshore but outside of

the port, it is mandatory to enter a pollution clean-up contract with a SPRO. At TGM, we offer comprehensive SPRO coverage for all Chinese seaports, and our dedicated office in Tianjin, China, ensures round-the-clock support with a single point of contact.

3) One-stop-shop Services

To enhance our services as a comprehensive one-stop-shop, we actively engage with forward-thinking professionals across diverse service sectors. This allows us to broaden our portfolio and cater to the unique requirements of our customers. A key advantage of choosing TGM is our ability to minimize the number of stops our clients need to make. By providing multiple services from a single location, our clients only need to reach out to one company, streamlining their experience and saving valuable time.

Tank cleaning: Our comprehensive service package encompasses planning, inspection, cleaning, and waste disposal, covering all aspects of the process. We take pride in our network of skilled professionals equipped with state-of-the-art tools and equipment, enabling us to deliver a high-quality and safe service regardless of tank contents, shape, or size. Through strategic planning and effective management, we prioritize minimizing disruptions to vessel operations while strictly adhering to the most stringent procedures.

Dry dock budget optimization: We handle the planning of waste disposal services, which can be arranged before the drydocking process, at a previous port, on anchorage prior to entering the drydock, or while the vessel is at the shipyard. Regardless of the location, we meticulously assess and determine the most cost-efficient option available for our clients.

Enviro Fleet Cloud: Through our Enviro Fleet Cloud, we provide our clients with real-time updates on all offloaded waste streams, both on a per-vessel and fleet-wide basis, for a specified period according to their requirements. This level of transparency ensures that TGM delivers high-quality support to companies holding ISO 9001 and ISO 14001. Once the disposal process is complete, the vessel's crew receives the MARPOL receipt, which is then submitted to TGM's Documentation department for uploading to the Cloud. Clients have the convenience of extracting a document containing all the relevant documentation, enabling them to make comparisons and establish future measures, such as reducing the usage of single-use plastic bottles onboard.

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OUR COMPANY

Services

4) Innovative green services

Sustainable MARPOL documentation via TGM owned EFC-Enviro Fleet Cloud, full transparency and analytical tools with customizable KPI tracking.

- **Sustainable documentation via TGM owned Enviro Fleet Cloud (EFC) with direct customer access:** The cloud guarantees a complete documentation, supporting ISO 9001:2015 and ISO 14001:2015 certified companies.
- **Full transparency through real time analysis on offloaded waste streams:** Via the TGM owned Enviro Fleet Cloud, members have direct access and gain full transparency through the real-time analysis on offloaded waste streams by vessel and fleet per a customized period.
- **Cost overview for budget control:** TGM invoices and MARPOL certificates are provided within the Enviro Fleet Cloud to ensure transparency and maximize budget control.

- **Implementation of budget limits:** According to each client's needs, budget limits are implemented and followed in order to avoid overspending.
- **Customizable KPI tracking:** TGM provides trackable KPIs which can be customized to each clients' needs. Clients can set measures i.e. to reduce plastic waste and easily monitor via the Enviro Fleet Cloud the effectiveness of same.
- **Ideal support for ISO 14001 and ISO 9001 certified companies:** As an ISO 14001:2015 certified company, we emphasize sustainable operations, both in our own offices and by our suppliers in ports. Customers can easily extract KPIs from Enviro Fleet Cloud that can be used for reports related to their ISO 14001 or ESG objectives.





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OUR COMPANY

Principles and values



Protection of the environment

All personnel serving for or being employed by our company are encouraged to reduce or eliminate the risk of pollution whenever possible. It is mandatory for the individual as well as for the company to protect the environment and all employees are advised to adopt a mature, positive attitude in this respect. Environmental procedures have been developed to avoid pollution as far as possible.



Customer satisfaction

It is our primary goal to fulfil the requirements of our shipping-, freight- and ship-management customers to the quality of our work and to delight them with our services. This is reflected by our maxim: "Always on the right course to find the right solution."



Identification of risks and opportunities

We have a pro-active approach in order to be prepared for the future.



Commitment to compliance obligations

We will at any time comply with any applicable national and international codes, guidelines, rules and regulations regarding the protection of the environment and other requirements to which the company subscribes.



Doing things right straight away

Our services are focused on convincing our customers with good work and enhancement environmental performance straight away. We react immediately to any malfunction by analysing and overcoming their cause. We strive for continual improvement.



Competency and professional behaviour

We guarantee the environmental consciousness of our staff and the high quality of our work by continuously training our personnel. We provide required methods, resources and trainings to prove our competency and our sustainable and professional behaviour every day.



Keeping and gaining customers

To reach our ambitious goals we do our utmost to keep our existing customers and to attract new customers.



Efficiency

We undertake to define KPIs that measure the ability of our company to comply with the above objectives and with the review of the KPIs serve as framework for the development of the company.



ISO Certification

In order to reach these quality- and environmental objectives we ensure that our QM-/EM system in conformity with DIN EN ISO 9001:2015 and DIN EN ISO 14001:2015 is understood, put into practice and maintained at all levels of our organisation.

Vision

Becoming the leading environmentally responsible waste management company of choice in the shipping industry and beyond.

Mission

TGMs objective is to drive sustainability throughout the waste management process and generate viable efficiencies for its customers and suppliers in a fully transparent, measurable and sustainable manner.

05

SUSTAINABILITY VISION AND MISSION

Our sustainability governance

Our vision is to become the forefront leader in environmentally responsible waste management, not only within the shipping industry but also beyond. TGM’s objective is to drive sustainability throughout the waste management process and

generate viable efficiencies for its customers and suppliers in a fully transparent, measurable and sustainable manner.

Our Sustainability Governance

Sustainability team (HSEQ-Department):



Cathrin Prikker
Managing Director



Ramon Vryze
Management Assistant



Wiebke Tietjen
Operator

Identifying, communicating and understanding our stakeholders

We decided to split the stakeholders into internal and external groups, prioritized them in order of importance to the company, and then choose the most critical ones to conduct the stakeholder engagement.

Internal stakeholders:

- Office Employees
- Shareholders

External stakeholders:

- Clients (shipowners/ship managers)
- Suppliers (disposal companies)
- Agencies





05

SUSTAINABILITY VISION AND MISSION

Materiality assessment

Materiality Analysis process

TGM has adopted a holistic approach to identifying the sustainability issues most relevant to its business operations. In April 2023, the company conducted a materiality analysis in line with the Global Reporting Initiative (GRI) Standards, engaging key stakeholders—defined as individuals or entities significantly affected by TGM’s activities or capable of influencing its strategic direction.

This analysis enables TGM to identify and prioritise material sustainability issues— those with significant economic, environmental, and social impacts that also influence stakeholder decisions. It serves as a foundation for embedding sustainable practices across the business and for enhancing resilience in the face of global health and climate challenges.

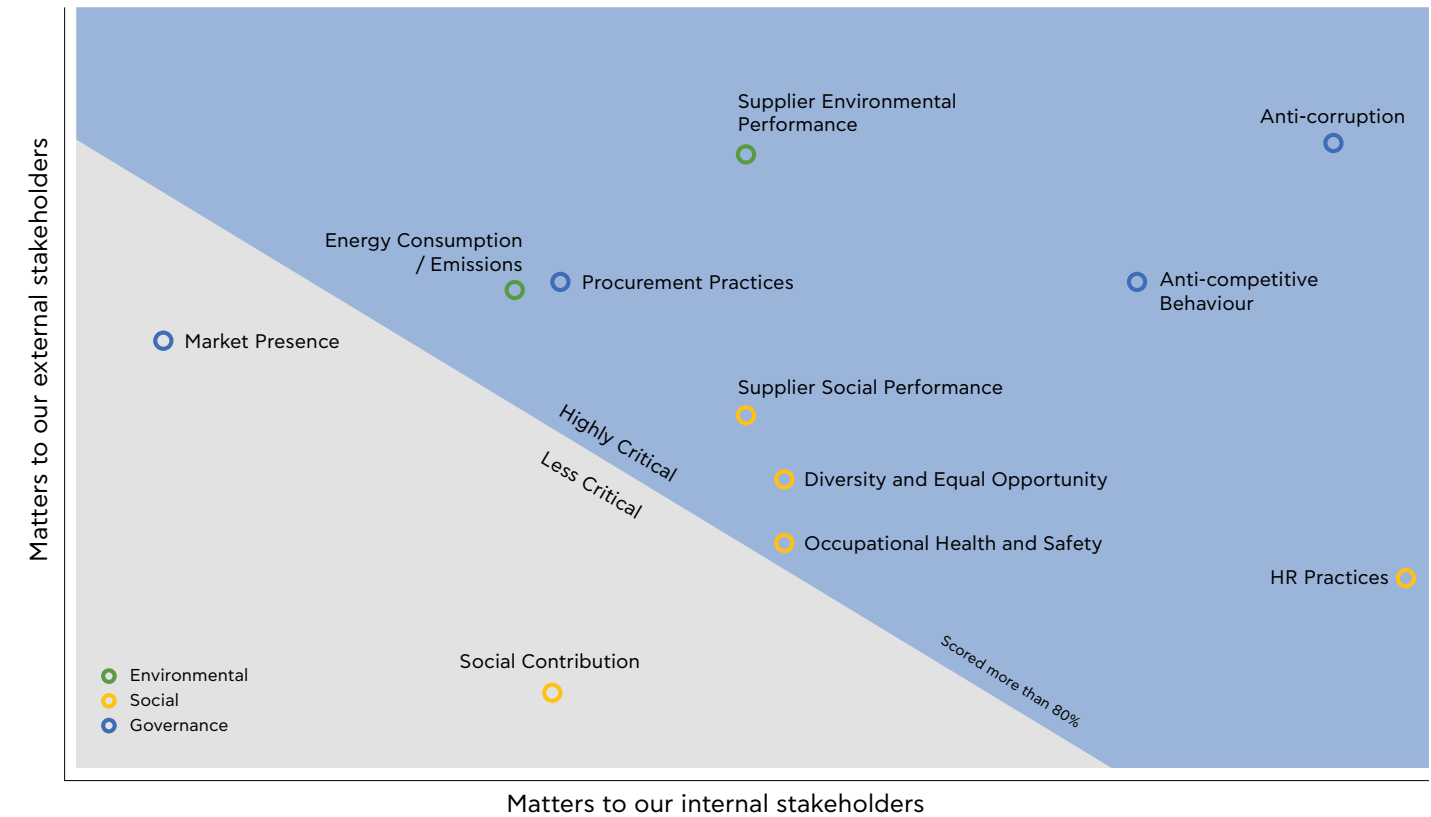
Through stakeholder consultation, TGM aims to better assess and manage environmental, social, and governance (ESG) impacts, risks and opportunities (IRO’s), aligning them with broader strategic goals, as this process offers an insight

into how TGM, as a leading global provider of ship waste management platforms, can impact the environment and society but also how changes occurring to the environment and society can impact TGM.

TGM engaged with key stakeholders- both internal & external- through an online survey focusing on sustainability issues. This initiative offered a 360-degree perspective on how various stakeholders view emerging global sustainability challenges.

Stakeholders were asked to rate the importance of various sustainability issues on a scale from 1 (not at all important) to 5 (very important). The topics presented were drawn from a broader list of 31 GRI material issues and refined to reflect the nature of TGM’s business. Ultimately, 11 sustainability issues were prioritised based on their relevance to the company’s operations.

Disclosure: From the 11 selected sustainable topics, 9 have been determined as «Highly Critical» and 2 as «Less Critical». For the 2024 Sustainability Report, TGM is evaluating its performance in relation to the 9 «Highly Critical» sustainable topics and discloses available information.



Materiality Analysis Conclusion

As a result of this materiality analysis, we were able to define the most material sustainability topics to our key stakeholders and as such we will be focusing our Sustainability Report and disclosures on those topics. In this report we present and analyse in detail the issues identified by this process.

06

OUR PERFORMANCE

Environmental



Sustainability & Environmental Green Policy

As an ISO 14001 certified company, we emphasize sustainable operations, both in the ports at our suppliers and in our own offices. It is our concern to consider the complete waste management cycle and to identify and involve the necessary actors. We take care of a high environmental and quality standard of our services as well as our offices. We are communicating our zero spill and anti-pollution policy to our supplier network as Key Performance Target. Beyond our day-to-day business, we strive to develop additional business models that support and expand our existing approach to sustainability.

Commitment

At TGM, we maintain stringent environmental standards for our suppliers, aligning with our own commitment to environmental protection. We ensure that all waste management companies in our network share the same dedication to avoiding adverse environmental impacts and consistently enhancing their environmental performance and management systems. Employee training on various environmental protection matters is a crucial component of our comprehensive program. To monitor and document the progress of our suppliers, TGM's HSEQ (Health, Safety, Environment, and Quality) department conducts regular audits and tracks improvements in their operations.

To foster innovation and encourage environmental advancements, we go the extra mile by implementing a real-time ranking system for preferred companies operating within ports. These rankings are based on the successful completion of services and serve as a benchmark for evaluating environmental performance. It is our expectation that TGM branch offices situated in prominent shipping hubs and major trading regions uphold the same high standards that we adhere to as a company. This ensures consistency and reinforces our commitment to environmental excellence throughout our global operations.

By committing to our Quality and Environmental Protection Policy, we are striving to consider the protection of the environment in all our business decisions.

This includes our commitment to the following principles to protect our planet:

1. Reduce the environmental impact of all our services.
2. Set and review targets and objectives for the protection of the environment.
3. Continuous improvement of our environmental performance and environmental management system.
4. Guide our customers and business partners to reduce and minimize waste.
5. Train our employees in our environmental principles and policy.
6. Expect adherence from our disposal partners to the Top Glory Marine Code of Conduct and Environmental Charter.



06

OUR PERFORMANCE

Environmental

Waste Streams Monitoring

All waste streams given ashore to port reception facilities are tracked from the initial declaration onboard until delivery into final destination ashore.

We monitor and record each waste stream through our Enviro Fleet Cloud ensuring high transparency to our clients being able to track KPIs, set measures and make comparisons based on documentation provided.

We hold our suppliers to the same high standards to which we are committed with regards to environmental protection. All waste management companies in our network are committed to avoiding negative impacts on the environment and to continuously improving their environmental performance and environmental management systems.

Plastic Offset

Through our Enviro Fleet Cloud our customers are able to track the generated plastic waste on

board of each ship and have exact figures for an offset.

In our efforts to contribute to the removal of waste from our waters and offset the plastic waste produced by our offices, we participated in the pioneering Everwave Project, purchasing plastic credits to remove 702 kg of waste from water sources.

We are committed to reducing the plastic in our oceans and seas and this is one way to put our words into actions while also doing our utmost to create more sustainable services for our customers.

Reducing the production and consumption of plastics is also one of the 17 SDGs by the UN, which makes this service crucial.

Environmental Protection Processes

This process has been developed in order to control activities which could represent a harm to the environment and is to be followed in our office-site.



POSITION	RESPONSIBILITY
Management	<ul style="list-style-type: none">ensuring that the process is performed as described by all staff
All staff	<ul style="list-style-type: none">following/complying with these procedures
HSEQ-Department	<ul style="list-style-type: none">supervising the compliance with these proceduresdisposal of electronic garbage and light bulbsenhancing environmental consciousness within the stafftraining of staff on environmental issues

Office Work Process

We put great emphasis on the training, education, information and motivation of our employees in order to strengthen their environmental awareness. We provide all the resources necessary to protect the environment.

06

OUR PERFORMANCE

Environmental

Waste Management

POSITION	RESPONSIBILITY
All staff	<ul style="list-style-type: none">• is requested to avoid garbage as far as possible• is requested to prefer to consume drinks provided in returnable bottles• brings food from home in reusable boxes
HSEQ-Department	<ul style="list-style-type: none">• supervises and observes the requirements of the garbage laws and regulations applicable to/ relevant for TGM Hamburg
All staff	<ul style="list-style-type: none">• separates paper- and plastic garbage and disposes it into the separate marked bins in the office• disposes food waste in the galley• arranges with the cleaning company/ housekeeping company of landlord that the garbage is disposed of separately so that it can be recycled• disposes of used batteries at the nearest stationary retail shop• disposes of light bulbs at the nearest stationary retail shop• checks the fulfilment of the above
HSEQ-Department	<ul style="list-style-type: none">• familiarises new staff with the above requirements



Water management

All staff:

- are encouraged to use water responsibly and in a resource-conserving manner
- inform the HSEQ-Department in case of a defect or dripping tub

Mobility

Company:

- provides tickets for public transport for free to the staff (if required)

All staff:

- use public transport/ bike to go to work (if possible)
- use office bike for short ways

The following delineates our policies and performance for issues related to the environment in which we analyse:

1. Energy Consumption & Emissions
2. Supplier Environmental Performance

Supporting SMM Maritime Start-up day & night
We have supported the SMM Maritime Start-up day & night as the purpose of this event is offering a platform to new and innovative maritime start-ups. At TGM, we recognize the importance of raising awareness about the necessity of promoting these start-ups as they take their first steps. By fostering a culture of innovation, we aim to drive the maritime industry towards a more sustainable future. Our commitment to

these start-ups is unwavering, as we believe they hold the key to groundbreaking advancements in maritime technology.

NearBees

At TGM, we are proud to sponsor our very own beehive. Together with a professional beekeeper who takes care of our bees, we support a healthy bee colony that produces honey each year. The honey that the bees don't need for their own survival is carefully harvested, jarred, and shared as a special gift with our customers – a sweet symbol of sustainability and partnership.

Recycling campaign on social media

We launched a campaign called 'The Green Alphabet Journey,' in which we shared facts and figures on social media for each letter of the alphabet to raise awareness of recycling, such as the benefits of recycling waste. This initiative not only educated the public but also encouraged them to take actionable steps towards a greener future. By engaging with our audience in a fun and informative way, we hope to inspire lasting change in recycling habits.

Clean-up Sessions

We, the TGM team, selected various locations in our area and conducted two clean-up sessions together, during which we removed garbage from the local environment. These efforts not only helped to beautify our surroundings but also fostered a sense of community and responsibility among our team members. By actively participating in these clean-up activities, we hope to inspire others to take similar actions and contribute to a cleaner, healthier planet.



06

OUR PERFORMANCE

Environmental



Supplier Environmental Performance

TGM keeps an updated vendor application form that explicitly asks for the final treatment of the supplier's waste. In addition, we are implementing a "Green Score" to evaluate our suppliers and rate them on environmental aspects. Our suppliers are audited by us on a regular basis and if suppliers have not performed to our standards and/or have caused environmental pollution in the process, the case is carefully processed and a non-conformity form is created by our HSEQ department. Further measures are then derived from this, which can lead to the exclusion of the supplier from our network.

Main focus for the TGM suppliers shall be to operate in an environmentally responsible and efficient manner with regards to:

- Minimize adverse impacts on the environment
- Comply with all applicable environmental laws and regulations
- Reduce the environmental impact of all services provided
- Set and review targets and objectives for the protection of the environment

- Continuously improve their environmental performance and environmental management systems Train their employees in all relevant matters of environmental protection
- Focus on CO2 reduction, and recycling material back into the production

100% Percentage of new suppliers that were screened using environmental criteria.

230 Number of suppliers assessed for environmental impacts.

0 Number of suppliers identified as having significant and/or potential negative environmental impacts.



Energy Consumption & Emissions

With our environmental charter, we commit ourselves to sustainable energy consumption and ensure that energy is used economically in the offices. We only use electrical appliances in eco mode where possible and source electricity from 100% green sources where we can. In part (of our offices), we can only influence our electricity supply. Due to our position as tenants, we have no data on energy and fuel consumption, and we have no influence on the choice of heat supplier.

Our environmental charter aims to protect nature as best as possible from all external negative impacts, and we also commit our suppliers to this through our SCOC. In order to minimise CO2 and other emissions resulting from the combustion of fuels, all TGM employees have been provided with a season ticket for public transport by the management. We also cooperate with the company Everwave, which collects plastic waste worldwide. We buy plastic credits from them so that our total annual plastic waste generated by all our offices is reduced to zero.

ENVIRONMENTAL PROTECTION PROCESSES - ENERGY MANAGEMENT	
HSEQ-Department	Ensures the use of energy-efficient bulbs in the office
All staff	<ul style="list-style-type: none">• ensure that the lighting is switched off as soon as it is bright enough from the sun• regularly remove the dust from lamps as this increases the brightness• ensure that any electronical equipment/ installations (like computers, printer, coffee machine and lighting, etc) are switched out before leaving the office at the end of the workday• ensure that the heater is reduced to a minimum• switch off the lighting in the restrooms and the kitchen when leaving the area• optimize ventilation

06

OUR PERFORMANCE

Social

In this section, we present our policies and performance for the issues related to our priority area, people and society, and focus on the following material topics:



HR Practices



Diversity, Equality & Inclusion



Occupational Health and Safety



Supplier Social Performance





Employees for 2024



New employees 2024



New employees 2024

Total number of employees that were entitled to parental leave, by gender.	 2	 1	TOTAL 3
Total number of employees that took parental leave, by gender.	 0	 0	TOTAL 0





06

OUR PERFORMANCE

Social



HR Practices

We believe that hiring exceptional people is essential to delivering outstanding service to our customers. From the beginning, we’ve committed ourselves to the highest standards of ethical conduct; whether in serving our clients, collaborating with colleagues, or upholding our company’s reputation.

Annual staff appraisals play a vital role in our commitment to growth and development. These reviews offer a valuable opportunity to recognize individual achievements, assess progress, and support each employee’s professional development by addressing their unique goals and needs.

Benefits and Compensation

For all full-time and part-time employees in all locations of our operation, we follow the benefits that are standard according to German labour law:

- health care
- parental leave
- retirement provision

Additionally, TGM goes above and beyond the German labour law and offers to all its employees:

- Membership for “Wellpass” (A membership that enables them to use all participating gyms, pools and spas for a fixed monthly fee partly subsidized by TGM)
- Tickets for public transport (that can also be used during employee’s leisure time)

Complaints Mechanism

Weekly and monthly team meetings are held to provide everyone with the opportunity to raise any concerns and stay informed about company-wide updates and changes. Meeting minutes are recorded and shared to ensure that all employees, including those unable to attend, remain fully informed.

In addition, a separate weekly meeting is held with key stakeholders to keep them updated on project progress and to address any operational issues. These meetings are supported by detailed weekly reports to ensure clear and consistent communication.

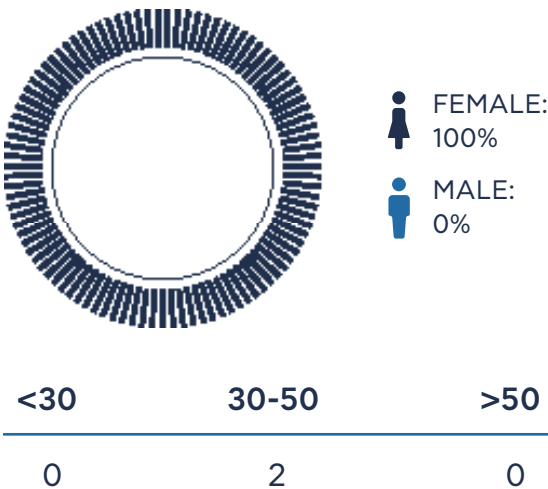


Diversity, Equality & Inclusion

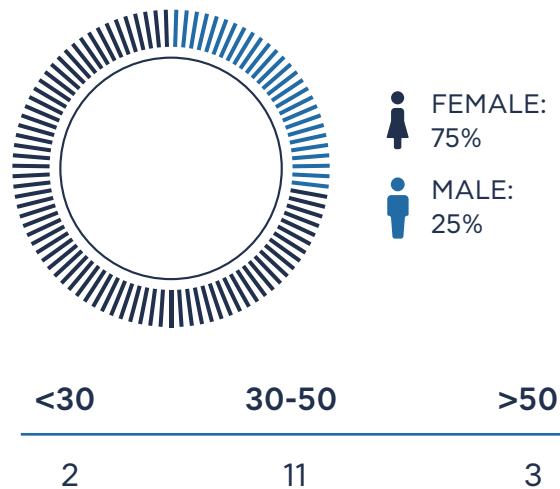
In compliance with German labour law, it is strictly prohibited for any company to engage in discrimination based on gender, age, skin colour, or religion. TGM is strongly committed to equal employment opportunities. Appointments,

promotions, training and performance appraisals are based on individual qualifications, experience and merit and are equally available to all qualified applicants and staff. TGM does not tolerate or condone any form of discriminatory treatment or harassment of any staff member.

Governance body



Employees



06

OUR PERFORMANCE

Social


8

DECENT WORK AND ECONOMIC GROWTH



12

RESPONSIBLE CONSUMPTION AND PRODUCTION



Occupational Health and Safety

For TGM, the health and safety of its employees is a top priority. The company’s stakeholders share this view and have therefore classified the issue as essential. In 2024, TGM continued its efforts to promote and maintain a culture of safety, with

the aim of achieving zero workplace accidents and placing great emphasis on mental well-being by ensuring a healthy work-life balance. Every employee is also allowed to donate blood during working hours for the benefit of the general public. In addition, many employees agreed to register as potential stem cell donors in 2024.

		No. Of Hrs Worked	No. Of Accidents	Fatality (FAT)	Fatality Rate	Total Recordable Work-related injuries (TRWI)	Injury Rate (IR)	Lost Hours	Lost Time Injury Rate (LTIR) / No. of hours lost/ number of hours worked x200,000	Lost Workday
No. of employees					No. of Fatalities / No. of hrs worked x 200,000		No. of accidents / No. of hrs worked x 200,000		No. of hours lost/ No. of hours worked x 200,000	
Total	16	25,568	0	0	0	0	-	0	-	0

Recordable work-related Injury or ill health				
	Near miss (NM)	First Aid Cases (FAC)	Major Incident (MI)	Restricted Work Case (RWC)
Total	0	0	0	0



06

OUR PERFORMANCE

Governance

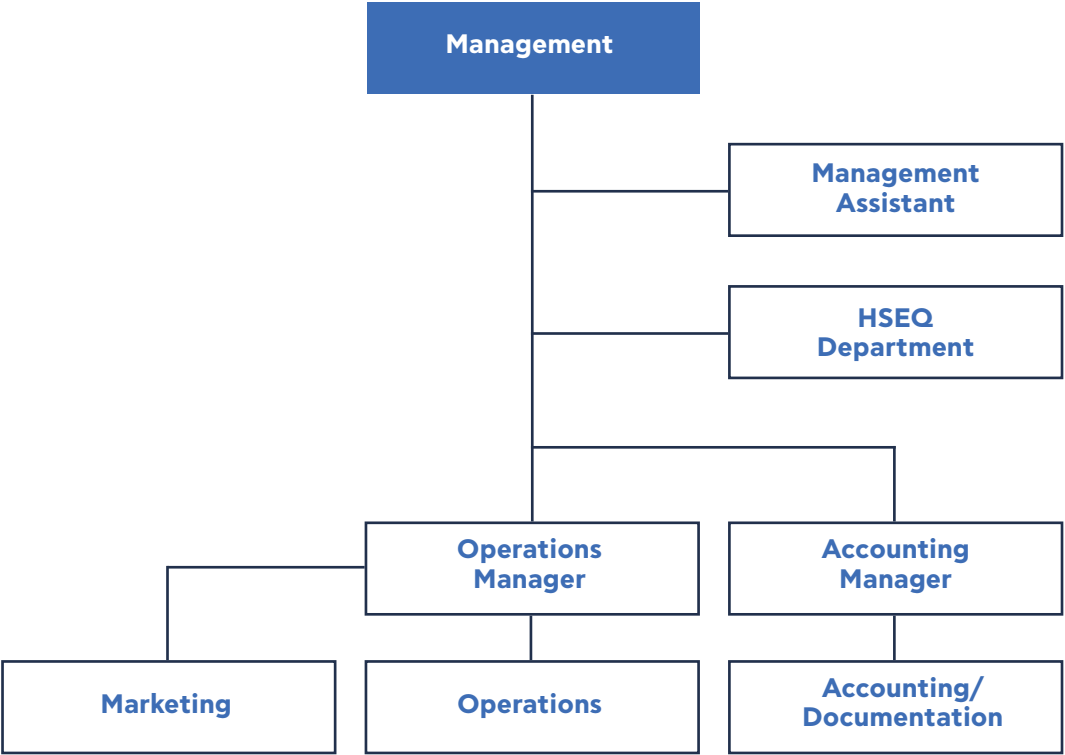
In this section, we present our policies and performance for the following material topics:

**Anti-corruption**

**Anti-competitive Behaviour**

**Procurement Practices**

Governance Structure
Organigram





06

OUR PERFORMANCE

Governance



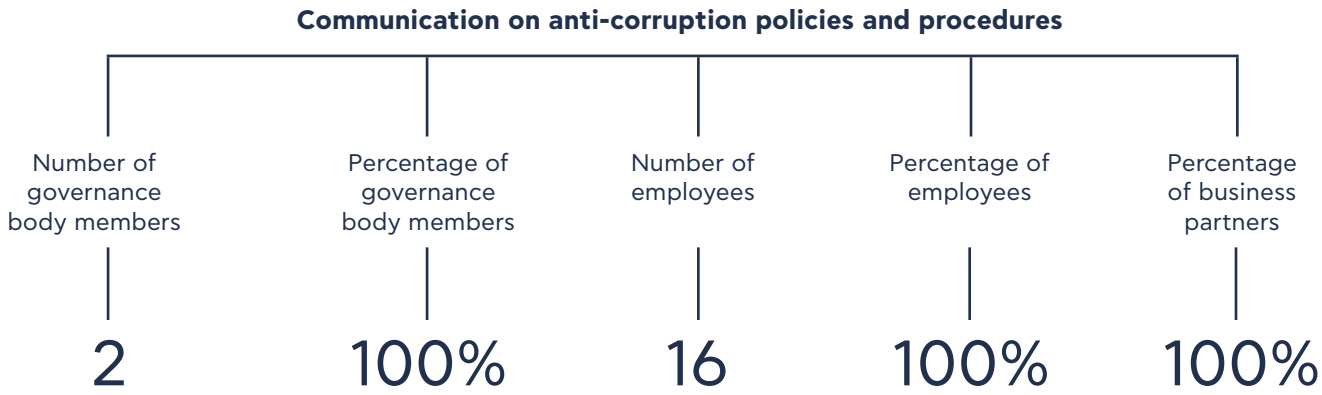
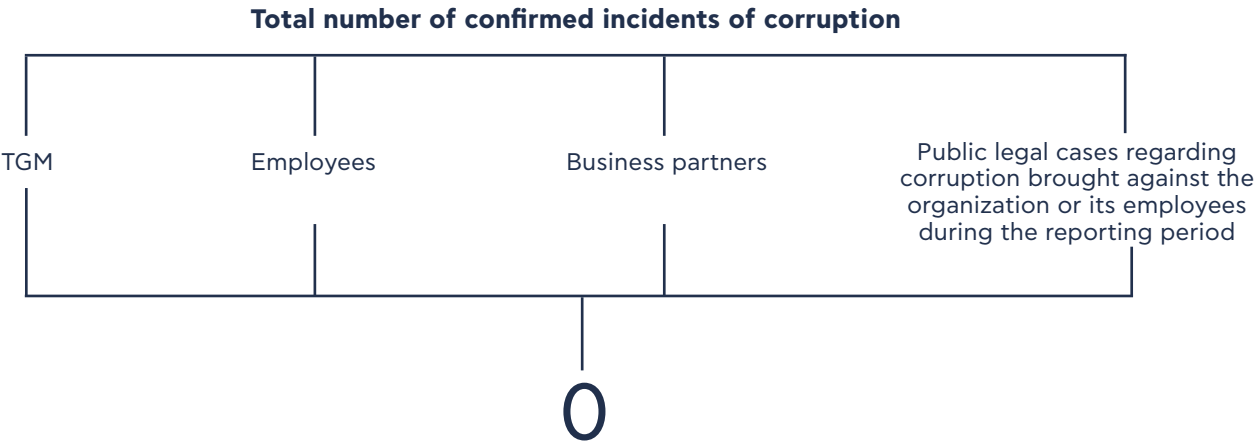
Anti-corruption

Our commitment is to conduct all of our business affairs in a transparent and ethical manner. We maintain a strict policy of zero tolerance towards bribery and corruption, and we are dedicated to conducting ourselves professionally, fairly, and with integrity in all our business interactions and partnerships, regardless of location.

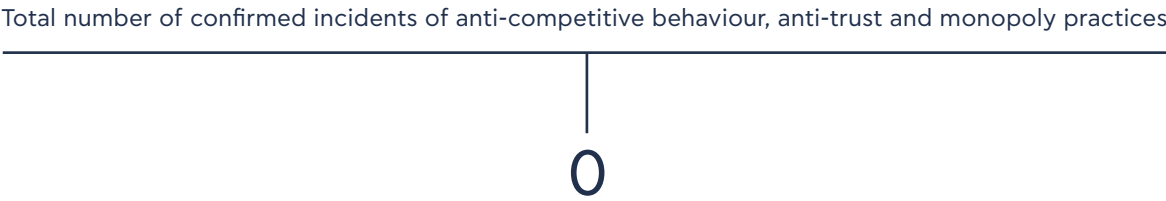
We adhere to the laws and regulations that pertain to countering bribery and corruption in

every jurisdiction where we operate. However, we also acknowledge and comply with the German laws and the laws of the European Union.

Individuals who engage in bribery and corruption can be subject to severe penalties, including up to twenty years of imprisonment. If we are found to be involved in any corrupt activities, we could face significant financial penalties and damage to our company's reputation. Consequently, we take our legal obligations extremely seriously.



Anti-competitive Behaviour



Auditing

TGM prioritizes the continuous monitoring and assessment of the health, safety, environment, and quality (HSEQ) practices of the disposal companies we collaborate with. This ensures that we fulfil our customers' disposal obligations in accordance with local regulations and the International Maritime Organization (IMO) MARPOL Convention.

In order to meet these crucial requirements, we conduct regular audits of the disposal companies. Even during the difficult period of Covid-19, we have implemented an online auditing system to ensure that all our environmental standards are being met. By doing so, we not only reduce our travel needs but also contribute to minimizing our environmental impact on the planet.

Procurement Practices

Through our extensive network of suppliers across the globe, we ensure that our Supplier Code of Conduct and Green Policy are strictly followed. This allows us to provide environmentally friendly disposal solutions with high recycling rates, thereby making a significant positive impact on the environment.

In addition, all our suppliers have signed our Human Rights Charter, demonstrating their commitment to promoting good and fair working conditions. As we continue to expand in the future, our philosophy and efforts will extend even further throughout the industry.



06

OUR PERFORMANCE

Governance

Supplier Code of Conduct & Green Policy

In our commitment to environmental sustainability and responsible business practices, TGM adheres to a strict Supplier Code of Conduct and Environmental Charter, as well as a Green Policy. These guiding principles underscore our dedication to reducing our environmental footprint while fostering ethical and responsible business relationships.

Our Supplier Code of Conduct emphasizes the importance of ethical and lawful business conduct for all our local subcontractors. It outlines our expectations for compliance with applicable laws and regulations, including antitrust, anti-corruption, data protection, and international trade control laws.

Furthermore, our Suppliers are required to align with our environmental principles, which include minimizing environmental impact, complying with environmental laws, reducing the environmental footprint of their services, setting environmental targets, and continuously improving environmental performance. This commitment extends beyond transactions with TGM to all aspects of their operations.

Our Green Policy reflects our corporate philosophy and vision, guiding our strategic

direction. It mandates the protection of the environment, encouraging all employees and the company itself to adopt environmentally responsible practices. We aim to reduce pollution risks, protect the environment, and implement environmental procedures to prevent pollution.

Our policy also prioritizes customer satisfaction, striving to meet and exceed the expectations of our shipping, freight, and ship-management customers. We are dedicated to identifying risks and opportunities proactively, complying with all environmental regulations, continuously improving our environmental performance, and investing in staff competency and professional behaviour through ongoing training.

Incorporating these principles into our Supplier relationships and internal operations, we maintain a steadfast commitment to environmentally friendly disposal solutions with high recycling rates. Through these efforts, we make a significant positive impact on the environment by reducing waste, promoting ethical business practices, and ensuring the well-being of local communities.

This commitment to sustainability aligns with our core values and demonstrates our dedication to responsible environmental stewardship, while also fostering strong and ethical partnerships throughout our supply chain.



07

MEMBERSHIPS, CERTIFICATIONS, AWARDS

Memberships



Certifications





08

GRI CONTENT INDEX

Statement of use	Top Glory Marine has reported the information cited in this GRI content index for the period January 2024 - December 2024 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	"Our Company" p.10
	2-2 Entities included in the organization's sustainability reporting	About this Report p.4
	2-3 Reporting period, frequency and contact point	"About this Report" p.4, "Our Company" p.10 , "Contact Us" p. 44
	2-4 Restatements of information	N/A
	2-5 External assurance	N/A
	2-6 Activities, value chain and other business relationships	"Our Company" p.10, "Sustainability, Vision and Mission" p.18
	2-7 Employees	"Our Performance, Social" p.30
	2-8 Workers who are not employees	N/A
	2-9 Governance structure and composition	"Sustainability, Vision and Mission / Our Sustainability Governance" p.18 , "Our Performance / Governance" p.36
	2-11 Chair of the highest governance body	"Sustainability, Vision and Mission / Our Sustainability Governance" p.18 , "Our Performance / Governance" p.36
	2-12 Role of the highest governance body in overseeing the management of impacts	"Sustainability, Vision and Mission / Our Sustainability Governance" p.18 , "Our Performance / Governance" p.36
	2-13 Delegation of responsibility for managing impacts	"Sustainability, Vision and Mission / Our Sustainability Governance" p.18 , "Our Performance / Governance" p.36
	2-14 Role of the highest governance body in sustainability reporting	"Sustainability, Vision and Mission / Our Sustainability Governance" p.18 , "Our Performance / Governance" p.36

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-15 Conflicts of interest	"Our Company / Principles and Values" p.16
	2-16 Communication of critical concerns	"Sustainability Vision and Mission / Identifying, Communicating and Understanding our Stakeholders" p. 18
	2-17 Collective knowledge of the highest governance body	"Sustainability, Vision and Mission / Our Sustainability Governance" p.18 , "Our Performance / Governance" p.36
	2-22 Statement on sustainable development strategy	"Letter from the CEO" p.6
	2-23 Policy commitments	"Our Company / Principles and Values" p.16 "Our Performance / Environmental" p.22 , "Our Performance / Governance" p.36
	2-24 Embedding policy commitments	"Our Company / Principles and Values" p.16 "Our Performance / Environmental" p.22 , "Our Performance / Governance" p.36
	2-25 Processes to remediate negative impacts	"Our Performance / Environmental / Commitment / Waste Streams Monitoring & Plastic Offset" p.24 , "Our Performance / Environmental / Supplier Environmental Performance" p.28 , "Our Performance / Social / HR Practices / Complaints Mechanism" p.32 , "Our Performance / Governance / Anti-competitive Behaviour / Auditing" p.39 "Our Performance / Governance / Procurement Practices" p.39
	2-26 Mechanisms for seeking advice and raising concerns	"Our Performance / Social", p.30
	2-27 Compliance with laws and regulations	"Our Company / Principles and Values" p.16, "Our Performance / Social" p.30, "Our Performance / Governance" p. 36
	2-28 Membership associations	"Memberships, Certifications, Awards" p.42
	2-29 Approach to stakeholder engagement	"Sustainability Vision and Mission / Identifying, Communicating and Understanding our Stakeholders" p.18 , "Sustainability Vision and Mission / Materiality Assessment" p.20
GRI 3: Material Topics 2021	2-30 Collective bargaining agreements	N/A
	3-1 Process to determine material topics	Sustainability Vision and Mission / Materiality Assessment p.20
	3-2 List of material topics	Sustainability Vision and Mission / Materiality Assessment p.20
GRI 204: Procurement Practices 2016	3-3 Management of material topics	"Our Performance / Environmental" p.22 , "Our Performance / Social" p.30 , "Our Performance / Governance" p.36
	204-1 Proportion of spending on local suppliers	"Our Performance / Governance" p.36
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	"Our Performance / Governance / Anti-Corruption" p.38
	205-2 Communication and training about anti-corruption policies and procedures	"Our Performance / Governance / Anti-Corruption" p.38
	205-3 Confirmed incidents of corruption and actions taken	"Our Performance / Governance / Anti-Corruption" p.38
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	"Our Performance / Governance / Anti-Corruption" p.38

GRI STANDARD	DISCLOSURE	LOCATION
GRI 302: Energy 2016	302-1 Energy consumption within the organization	"Our Performance / Environmental / Energy Consumption & Emissions" p.29
	302-2 Energy consumption outside of the organization	"Our Performance / Environmental / Energy Consumption & Emissions" p.29
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	"Our Performance / Environmental / Energy Consumption & Emissions" p.29
	305-2 Energy indirect (Scope 2) GHG emissions	"Our Performance / Environmental / Energy Consumption & Emissions" p.29
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	"Our Performance / Environmental / Supplier Environmental Performance" p.28
	308-2 Negative environmental impacts in the supply chain and actions taken	"Our Performance / Environmental / Supplier Environmental Performance" p.28
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	"Our Performance / Social" p.30
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	"Our Performance / Social / HR Practices" p.32
	401-3 Parental leave	"Our Performance / Social" p.30
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	"Our Performance / Social" p.30
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	"Our Performance / Social / Occupational Health and Safety" p.34
	403-2 Hazard identification, risk assessment, and incident investigation	"Our Performance / Social / Occupational Health and Safety" p.34
	403-3 Occupational health services	"Our Performance / Social / Occupational Health and Safety" p.34
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	"Our Performance / Social / Occupational Health and Safety" p.34
	403-9 Work-related injuries	"Our Performance / Social / Occupational Health and Safety" p.34
	403-10 Work-related ill health	"Our Performance / Social / Occupational Health and Safety" p.34
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	"Our Performance / Social" p.30
	404-2 Programs for upgrading employee skills and transition assistance programs	"Our Performance / Social" p.30
	404-3 Percentage of employees receiving regular performance and career development reviews	"Our Performance / Social" p.30
GRI 204: Procurement Practices 2016	405-1 Diversity of governance bodies and employees	"Our Performance / Social / Diversity, Equality & Inclusion" p.33
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	"Our Performance / Social / Diversity, Equality & Inclusion" p.33
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	"Our Performance / Social / Diversity, Equality & Inclusion" p.33
	414-2 Negative social impacts in the supply chain and actions taken	"Our Performance / Social / Diversity, Equality & Inclusion" p.33



09

FEEDBACK

We value your feedback in order to develop and advance our approach to sustainability. We appreciate your views, which may be sent to info@topglorymarine.de

Registered address

Top Glory Marine Service GmbH & Co. KG (Germany)
Alter Wall 55, 20457 Hamburg (Germany), Germany
+49(0)40-609232-02

TOP Glory Marine Service Ltd. (China)
7 HongTai Building, No. 26 JiedaLu BinHai
New Area, Tianjin China
+86-158-2259-3938
+86-136-0206-5908

Website

<https://topglorymarine.de>





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