



Navios Maritime Holdings Inc.

# Sustainability Report 2021





# OUR VALUES

**RESPONSIBILITY** through personal accountability for our actions and results. We accept the consequences of our decisions.

**RELIABILITY** by consistently delivering cargoes safely and on time.

**HONESTY** by insisting on truthfulness with each other, with our customers and in our business records. We expect and value open communication and integrity.

Continuous pursuit of **EXCELLENCE** through hard work and continuous self-improvement.

**OWNERSHIP & COMMITMENT** by doing what we promise and owning what we do.

**SUSTAINABILITY** is at the core of our ethos. A sustainable company is a resilient company – one that can thrive through the changes that the coming years will bring.

This is Navios Maritime Holdings' ("Navios Holdings") second annual Sustainability Report and refers to the period 01 January through 31 December 2021, with references to operational and other targets for 2021 and beyond.

It conveys the company's approach to Sustainability, broken down into Environmental, Social and Governance ("ESG") fields. The report also tracks performance compared to previous years and industry benchmarks, and it describes the targets that the company has set for its future performance.

The report considers the following standards, goals, and guidelines in compiling and presenting the report's content:

- **United Nations** Sustainable Development Goals (SDGs);
- GRI Standards Core option;
- Reporting Requirements of the **Poseidon Principles**;
- **New York Stock Exchange** (NYSE) ESG Reporting Guidelines; and
- Marine Transportation Sustainability Accounting Standards of the **Sustainability Accounting Standards Board (SASB)**.

This report provides a transparent account of the company's Sustainability performance, targets and strategy, and applies rigorous global standards for comparability and comprehensiveness.



# CEO STATEMENT

A year ago, we committed to being a leader in sustainability. This pledge included all our activities. We have spent the past year working towards this commitment by striving to measure and reduce emissions and waste, aiming to achieve 'Zero Incidents', and focusing on always operating ethically, compliantly, and transparently.

Sustainability, in large part, is about decarbonization. Accordingly, we are always seeking to reduce our carbon footprint, while we evaluate options for ESD retrofits and data collection upgrades. In the absence of a clear, sustainable fuel alternative, we have been renewing our fleet with new, more energy-efficient vessels. We believe this allows us to meet our mandate of being an efficient provider of maritime transportation while managing emissions to the maximum allowed by current technology. To that end, I note that our fleet is under the average age of vessels in the industry.

However, our company's core values go beyond decarbonization. We have also integrated ESG themes into our corporate culture by including into business strategy discussions about both corporate governance and social responsibility processes and frameworks. We view transparency, human rights, health and safety, and inclusion and diversity as fundamental tenets of our business. These core values provide business resilience and should bless us with a bright future.

I am proud of what we have achieved so far and have full confidence that the Navios team and those affiliated with us will continue to make material progress towards our sustainability goals.



## Navios Holdings by the Numbers

### OUR GLOBAL COMMODITY FLOWS



Navios Holdings is a global shipping and logistics company providing worldwide seaborne transportation and trans-shipment solutions in the dry bulk sector. Our vessels transport major bulks (iron ore, coal, minerals and grain) and minor bulks (soya beans and steel products), and our major subsidiary, Navios South American Logistics Inc. (NSAL), provides storage and marine transportation needs of petroleum, agricultural, and mining customers through our port terminals, river barge, and coastal cabotage operations.

<sup>1</sup> Navios Holdings maintains its head offices in The Cayman Islands. Navios Holdings has contracted with a wholly-owned subsidiary of N Shipmanagement Acquisition Corp. (NSM) for the technical, commercial, administrative, and technical management of its fleet. Navios Holdings occupies office space provided by that NSM subsidiary.

<sup>2</sup> Excludes chartered-in vessels under long-term contracts.

<sup>3</sup> Navios Holdings does not employ any staff. The NSM subsidiary contracted by Navios Holdings for the technical, commercial, administrative, and technical management of its fleet employs land-based employees.

US \$585.8M in revenues
8 offices around the world <sup>1</sup>
25 vessels as of December 2021 <sup>2</sup>
2.9M DWT <sup>2</sup>
10.5 years average age of fleet <sup>2</sup>
311 land-based employees <sup>3</sup>
>60 years in the Shipping Market
838 Port Calls

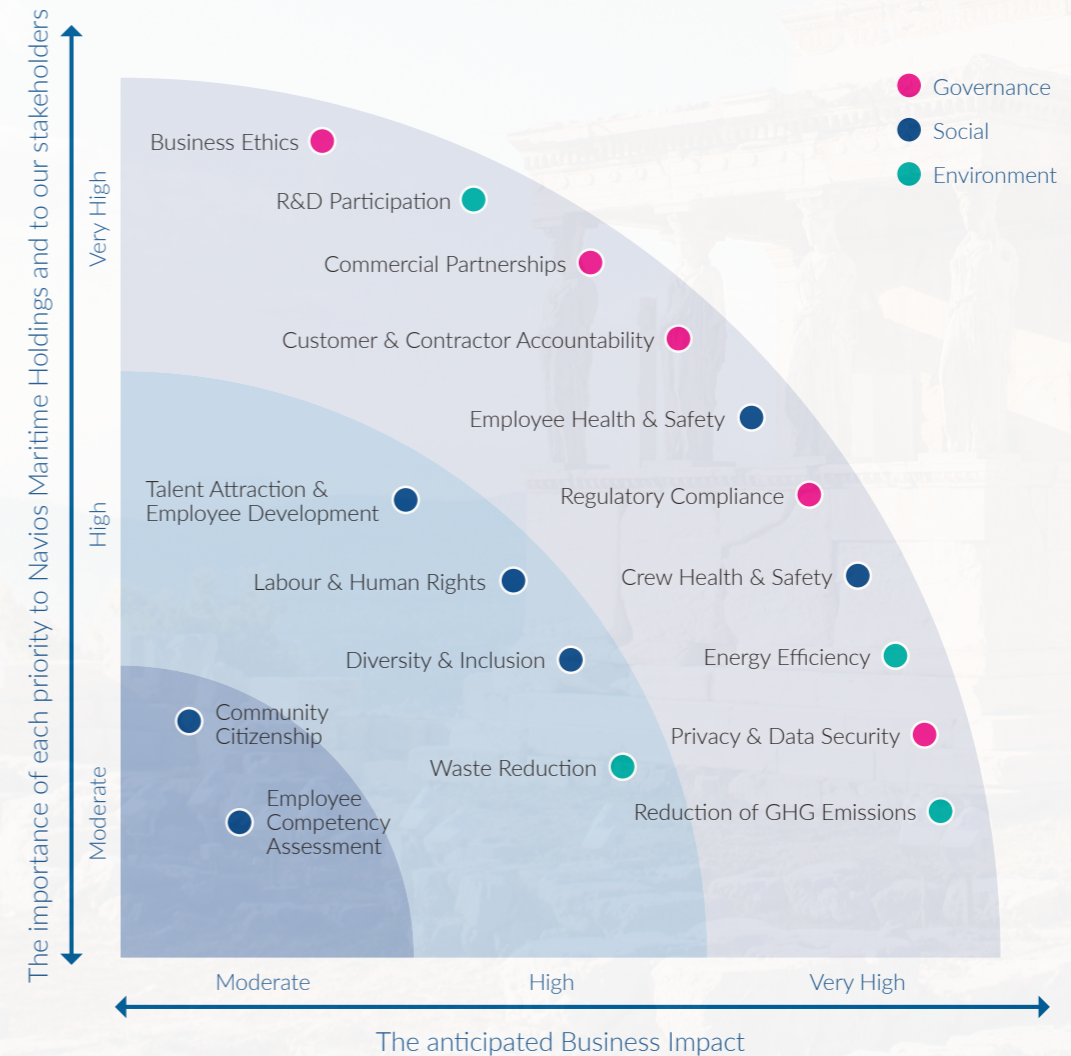
## Our ESG Strategy and Materiality

As part of Navios' aspiration to be a green and sustainable leader in the industry and play our role in leaving a better world for the next generations, we are devoted to investigating and adopting different approaches to reducing our carbon footprint and environmental impact; promoting health, safety, and social responsibility among our employees and respecting the international communities in which we do business; and adopting corporate governance that prioritises ethics, transparency, and balanced synergy with our business partners.

To ensure that our efforts are focused on where they should be and that they are having the impact we intend them to have, in 2020 we conducted a materiality assessment to identify our sustainability priorities to ensure the future growth of the company. We reviewed the output from this assessment in 2021 and deemed that it continued to provide insights into the expectations, best practices, and most important considerations among our customers, investors, and the broader societies with which Navios interacts.

We will continue to review the output annually and will update as deemed necessarily.

### NAVIOS MARITIME HOLDINGS' 2021 MATERIALITY ASSESSMENT







# OUR ESG ROADMAP

## ENVIRONMENTAL RESPONSIBILITY & SUSTAINABILITY

- Strict, verified compliance with applicable environmental regulations
- Measured, methodical emissions and waste monitoring and reduction
- Improved energy efficiency and vessel performance
- Development of new technologies through research partnerships

## SOCIAL RESPONSIBILITY

- 'Zero Incidents' through prioritized safety of all employees
- Accessible medical care and mental health resources
- Encouraged diversity and gender equality
- Giving back to the communities in which we operate

## CORPORATE GOVERNANCE

- Elevating business ethics to the topmost tenet guiding our operations
- Compliance through audited policies and periodic training
- Support for employees and others who report non-compliance
- Accountability for counterparties





# ENVIRONMENTAL RESPONSIBILITY & SUSTAINABILITY

Navios Holdings envisions a maritime industry that allows for fair and sustainable global trade flow with no harm to the environment. Navios Holdings' fleet maintains certification consistent with the International Organization for Standardization ("ISO") 14001 for its offices and ships covering environmental protection. Our commitment to a clean industry and our progress towards that goal are detailed in the following pages, and are made evident through the implementation and on-going improvement of sound environmental measures and practices.

The world in which we operate is undergoing radical physical change at unprecedented rates. This year, the UN Intergovernmental Panel on Climate Change published their Sixth Assessment Report<sup>1</sup> describing the extent of the climate crisis we face. In even the most ambitious scenarios of decarbonisation trajectories, there remain significant physical and transitional risks, ranging from increased extreme weather events to climate migration. This is without question a global issue and, as a global company, Navios Holdings embraces its responsibility in taking action in this crisis.

- **STRICT, VERIFIED COMPLIANCE WITH APPLICABLE ENVIRONMENTAL REGULATIONS**
- **MEASURED, METHODICAL EMISSIONS AND WASTE MONITORING AND REDUCTION**
- **IMPROVED ENERGY EFFICIENCY AND VESSEL PERFORMANCE**
- **DEVELOPMENT OF NEW TECHNOLOGIES THROUGH RESEARCH PARTNERSHIPS**

<sup>1</sup> <https://www.ipcc.ch/assessment-report/ar6/>

## Corporate Environmental Policies

Environmental protection and waste management are among Navios Holdings' highest priorities. The company's environmental policies reflect its commitment to environmentally responsible operations and to a cleaner environment. They are fully backed and supported by management, regularly reviewed and updated, and designed to steer the company towards meeting its aggressive goal of reducing its environmental impact to zero. Each policy is guided by and consistent with applicable and—where appropriate—anticipated regulations:

- Enhancement of Energy Efficiency and Reduction of GHG Emissions
- Garbage Management
- Enhancement of Energy Efficiency and Reduction of GHG Emissions
- Handling of Oily Bilge Water / Sludges Generated in Machinery Spaces - Stern Tube Oil - Inert Gas Effluent Discharge
- Sewage and Grey Water Discharges
- Minimisation of the use of Antifouling Paints Containing Biocides
- Minimisation of the use of Refrigerated Gases (CFCs, HCFCs, HFCs) and Halon
- Promotion of Environmentally Friendly Ship Recycling Practices
- Increase of Environmental Awareness of Office/ Shipboard Personnel
- Reduction of FW and Electric Energy Consumption
- Reduction of VOC Emissions
- Reduction of Chemicals Consumption
- Noise Management
- Ballast Water Management

## Environmental Compliance

Navios Holdings recognizes that policies dictating compliance are not the same as complying. For this reason, the company adopts tools and technologies designed to support crew members in strictly adhering to all applicable environmental regulations and proactively identifying any deviation from that goal.

The company's voluntary adoption of the Environmental Awareness Campaign (EAC) is intended to identify and prevent potential non-compliances. The EAC is comprised of compliance verification measures, such as vessel-specific seal plans to control sensitive points of engine room and deck piping; requirements that padlocks be placed along Oily Water Separator (OWS) discharge lines, with regulated access to the padlock keys; and checklists with supporting photographs and digital data recorded by vessel equipment that are collected and reviewed following each OWS operation. A specialised, full-time team

continues to support the goals of the EAC and with the daily review of relevant vessel records.

Furthermore, in 2020, we planned to roll out our customised Electronic Oil Record Book (eORB) software to all vessels. We are proud to have met this goal. Each vessel now has installed onboard Administration-approved, MARPOL Annex I recordkeeping software that is unique to each vessel in accordance with its own relevant piping diagram. The software allows the environmental compliance team to track and review eORB entries in real-time, offering Chief Engineers and Chief Officers feedback and advice as soon as the need arises.

## Measuring and Reducing GHG Emissions

### WE TARGET CARBON NET-ZERO OPERATIONS BY 2050

A major part of the maritime industry's ESG focus has been driven by its environmental—and more specifically, its energy efficiency and emissions reduction—component. Since our inception, protecting the environment has been a core part of our ethos. We continue to champion this through our aggressive decarbonization efforts, committing to a structured retrofitting and vessel renewal process, industry-leading environmental data monitoring software, and working with long-term time charterers that share our ambitions.

### YEAR-ON-YEAR PROGRESS

In 2020, we aspired to reduce CO<sub>2</sub>, SO<sub>x</sub>, and NO<sub>x</sub> emissions; sludge and oily bilge production; solid waste and garbage production; and to minimise shoreside electricity and paper consumption.

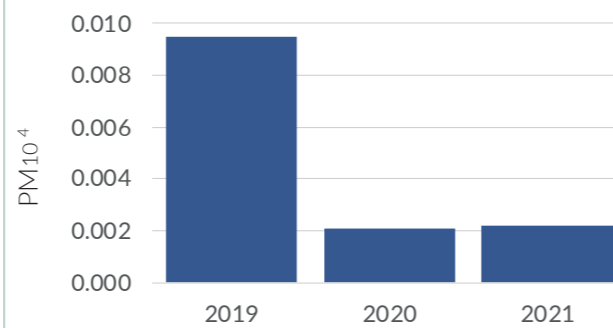
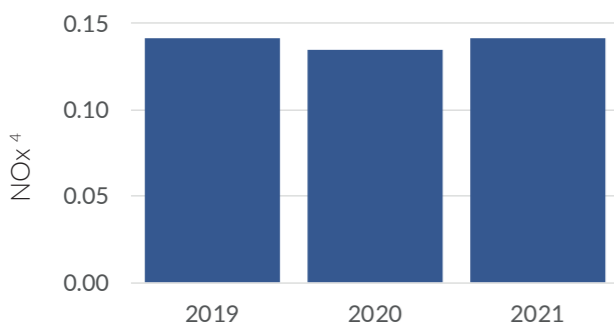
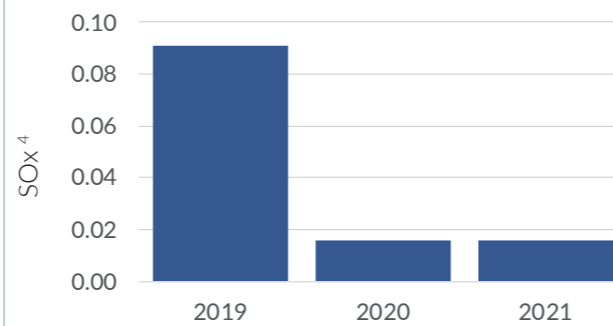
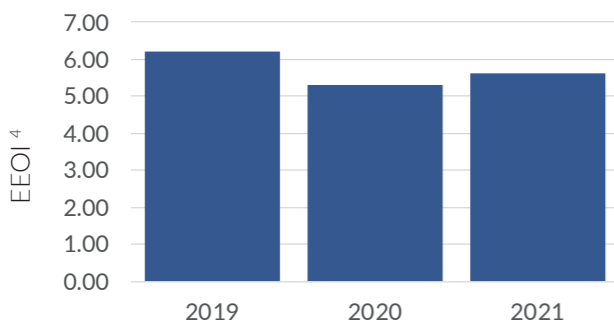
As the COVID-19 Pandemic waned and borders began to reopen, the dry bulk and container markets saw a surge: The world's demand for commodities and goods rose, whilst the supply of vessels was constricted by supply chain challenges and trade tensions. The increased market demand necessitated an increase in the average speed at which our vessels sailed, resulting in an overall increase in emissions. Similarly, as employees returned to the office, shoreside energy and paper consumption also increased.

Our bulk and container fleets both saw an increase their average EEOIs, and NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> emissions.

Year	EEOI	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>
2019	6.22	0.14	0.09	0.0095
2020	5.83	0.13	0.02	0.0021
2021	5.63	0.14	0.02	0.0022

<sup>2</sup> Emissions statistics refer to vessels managed on behalf of Navios Holdings by NSM's subsidiary.





Shoreside energy consumption for the year was 619,632kwh, and 6.05t of paper were consumed<sup>1</sup>.

Bilge (m <sup>3</sup> )	Sludge (m <sup>3</sup> ) <sup>2</sup>
1,629.36	2,077.71

According to the International Union for Conservation of Nature (IUCN), at least 14 million tonnes of plastic end up in the ocean every year. This kind of pollution is a serious threat to food safety and quality, human health, and coastal tourism. As stewards of the marine environment, and first-hand witnesses of this kind of damage, we are committed to managing our own waste with maximal respect for the environment.

### DATA COLLECTION: OUR PLAN FOR IMPROVEMENT

Companies cannot improve what they do not measure. Navios Holdings' highly efficient delivery of prompt emissions data from vessels allows us to inform strategy and evaluate our progress. The improved utilisation of data-monitoring, verification, and assessment systems provides us with the requisite information to make evidence-based decisions on how to improve vessel performance.

<sup>1</sup> These figures refer to the Greece office.

<sup>2</sup> Emissions statistics refer to vessels managed on behalf of Navios Holdings by NSM's subsidiary.

Our in-house vessel-data monitoring programme draws from multiple platforms:

- All vessels are equipped with a custom software interface between the vessel and the shoreside office. Among other data, crews input fuel consumption figures from which emissions rates are extrapolated and tracked by a shoreside team, ensuring that vessels always operate at optimal performance.
- All vessels are also fitted with the customised eORB software. Real-time user inputs, monitored by a full-time environmental compliance team, allow for continual tracking of oily waste production rates, bilge and slops discharge operations, and sludge incineration. The software provides us with the best, high-quality information in a timely and clear manner that is unrivalled.
- This year saw further expansion of our online performance software tool that further assists in the reduction of energy consumption. The software effectively calculates and monitors each vessel's Energy Efficiency Operational Indicator (EEOI) in alignment with the IMO MEPC.1/Circ.684, plus other key GHG emissions including SOx, NOx and particulate matter.



Through our data monitoring systems, we remain fully aligned with the EU MRV and IMO DCS requirements, and position ourselves to minimise our emissions and ensure that our future operations are as efficient as possible. Our vessels also participate in RightShip's GHG Emissions Rating Scheme.

### IMPROVED ENERGY EFFICIENCY AND VESSEL PERFORMANCE

The regulatory horizon presents new challenges, with EEXI and CII compliance becoming mandatory in 2023. The need to improve vessel efficiency has resulted in an industry-wide push for retrofits, technological upgrades, fleet renewals, and exploration of zero-carbon fuels. Our commitment to seek alternative, sustainable fuels; to continually evaluate and adopt appropriate energy-efficient technologies; and to own and operate a modern, energy-efficient fleet continues. We are also committed to adopting best practice energy management and behaviours onboard.

Research Partnerships: Our partnership with the ITOCHU joint study framework has expanded this year to include thirty-four companies and organisations that share the collective goal of taking tangible climate action. Through collaboration with fellow organisations contributing to the joint study framework, Navios Holdings hopes to progress the collective understanding of the feasibility of an integrated ammonia supply chain. The exploration of low carbon fuels and improving the flow of information between interested stakeholders will be vital in creating a future of cleaner fuels and a low-carbon society.

ESD Retrofits and EEXI Compliance: Navios Holdings has been researching and executing on an extensive retrofitting programme since 2018. Aided by 2020's

thorough technical assessment by DNV, we began selecting the most appropriate energy saving devices with a view to ensure all our vessels would meet the IMO-required efficiency standards within 2021. This year, we continued installing propeller boss cap fins and energy saving ducts on multiple vessels.

We are proud to report that all Navios Holdings-owned vessels were anticipatorily EEXI-compliant as of 31 December 2021.

LED Light Retrofitting: In 2020, we looked to increase the number of vessel accommodations fitted with LED light systems. We have continued to retrofit vessels with them, leading to a significant impact on vessels' energy use.

Fleet Renewal Program: We are in the midst of an aggressive fleet renewal program. Navios Holdings' fleet will soon consist of five newbuilding Capesize vessels, two newbuilding Panamax vessels, one newbuilding VLCC, and ten newbuilding Containerships, all expected to be delivered within the next three years or earlier.

Counterparty Cooperation: Navios Holdings' business model and sustainability goals are complementary. We aim to work with long-term charterers to facilitate more efficient and more sustainable day-to-day and year-to-year operations of our vessels.





# SOCIAL RESPONSIBILITY

From shoreside employees to seafarers and their families, Navios Holdings appreciates that its success rests on thousands of people from around the world, and we recognize and embrace our responsibility to them. We prioritise the empowerment of and investment in our people so that together, we may overcome whatever challenges may lie ahead.

Navios Holdings is committed to being a responsible corporate citizen, respecting human rights and supporting the protection and advancement of human rights. We have zero tolerance for labour and human rights abuses, and we strive to ensure that we have the necessary systems and processes to identify actual and potential issues in this area. We respect, protect, and promote the full range of human rights, including all those described in the United Nations' Universal Declaration of Human Rights, and we acknowledge the corporate responsibility to respect human rights articulated in the United Nations' Guiding Principles on Business and Human Rights.

- 'ZERO INCIDENTS' THROUGH PRIORITIZED SAFETY OF ALL EMPLOYEES
- ACCESSIBLE MEDICAL CARE AND MENTAL HEALTH RESOURCES
- ENCOURAGED DIVERSITY AND GENDER EQUALITY
- GIVING BACK TO THE COMMUNITIES IN WHICH WE OPERATE

## Key Social Statistics

LTIF	TRCF	Crew Retention	Deficiencies per Inspection (YoY)
0.00	0.00	97.84%	0.91 (-38.5%)

Gender Diversity: 46% Women  
Shoreside Retention: 88%



<sup>1</sup> Statistics related to vessel operations (e.g. PSC, TRCF, LTIF) refer to vessels managed on behalf of Navios Holdings by NSM's subsidiary.

## Prioritizing Safety and Making Healthcare Accessible

At Navios Holdings, safety and health come first. Our health and safety management systems are certified to ISO 45001 Occupational Health and Safety standard and the International Safety Management (ISM) Code. These systems undergo frequent review to guarantee the best possible provision of safety and healthcare to our shoreside and seagoing employees.

### ZERO-INCIDENTS

It is our firm belief that job-related accidents and injuries are preventable, and for this reason, we have set for ourselves the aspirational goal to experience zero incidents. Our Zero Incident Policy is comprised of:

- Global responsibility of all employees to monitor their work environment, identify unsafe practices and risky behaviours, and correct them appropriately.
- An embedded safety culture based on common understanding, open communication, and close collaboration facilitated by cross-cultural communication.
- Personal responsibility for individual actions and mutual responsibility for team actions.

Our approach in establishing, reviewing, maintaining and expanding our Safety Management System (SMS) embraces the following principles:

- Comply with or exceed all safety-related laws and regulations
- Methodically identify and assess risks to seafarers and communicate them effectively
- Perform periodic audits of the SMS to assess its continued effectiveness and plan concrete actions to improve it
- Train supervisors, managers, and office personnel to conduct and participate in audits, self-assessments, and work-related incident investigations
- Invest in technology to promote safe navigation and vessel structural robustness

We expect that DryBMS will introduce new, rigorous standards and improved recommendations on best practices. In anticipation, Navios Holdings is developing a more advanced and robust SMS to help make our vessels even safer. Among other areas, the system will take an innovative approach to addressing safety risks, with a particular focus on the way we make decisions in undertaking our work.

Our current systems fully comply with all safety-related laws and regulations, adhering to best practice. All employees are trained on relevant







health and safety related courses, and relevant supervisors, managers and other personnel are trained to effectively audit and assess work-related incident investigations. Additionally, manager visits are routinely organised to assess safety standards aboard vessels.

## Health and Safety

### ACCESSIBLE MEDICAL AND MENTAL HEALTH CARE

Navios Holdings cares not only for the safety but also for the general wellbeing of its seafarers and shoreside employees. All seafarers have 24-hour access to medical advice at no additional cost to them.

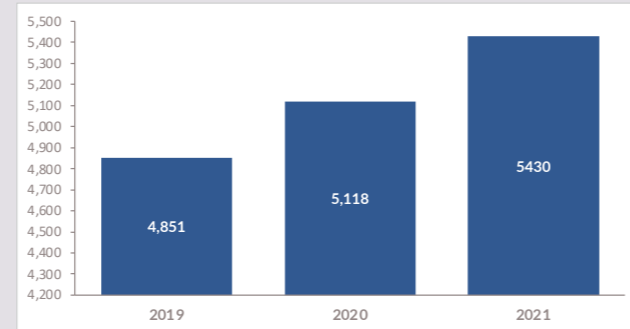
Managing the risks of COVID-19 has been a huge focus. In 2021, we invested over €758,000 in shoreside PPE, disinfection costs, and testing. This goes some way to encapsulating the seriousness with which we take the health of our staff. A further €187,091 was dedicated to the shoreside Employee Health Plan, increasing from last year<sup>1</sup>. Shoreside, measures designed to mitigate the introduction and spread of the virus onboard are continually reviewed, updated, and communicated to each vessel.

As we begin to emerge from the Pandemic and return to a more “normal” working environment, we realize that COVID-19 brought us isolation like many of us have never experienced, few experiencing the worst of this more than our seafarers. This shone a renewed light on the mental wellbeing of seafarers. We therefore strive to ensure that our practices go beyond the minimum standards dictated by MLC guidelines, regarding issues such as rest periods, overtime, meal provision, and shore leave. Furthermore, specific initiatives to effectively address mental health concerns include the training of senior officers in the identification of early warning signs, so that potential issues can be addressed early on. Immediate and 24/7 communication between vessels and the office is strongly encouraged for any reason deemed necessary by our crews. This is complemented by the provision of 24/7 access to mental health support that we encourage all our staff to use. Expanding Internet access onboard is another area of focus, so that seafarers can be in contact with families and loved ones.

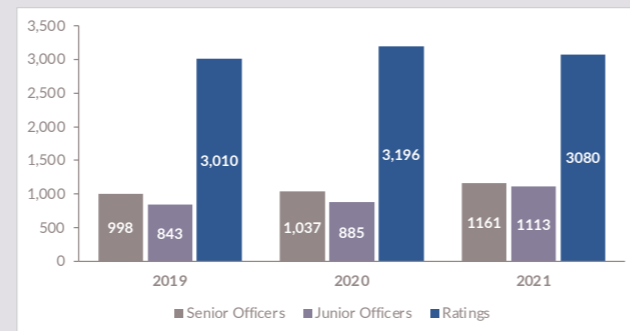
## Talent Attraction and Employee Development

By investing in the working conditions and personal development of our shoreside staff and crew, we not

only create value for Navios Holdings, but we provide fulfilling careers for thousands of people.



NAVIOS POOL OF SEAFARERS



NAVIOS NUMBER OF SEAFARERS ABOARD OUR FLEET

We invest heavily in training, both, seafarers and shoreside staff. In 2021, 64 training sessions were conducted shoreside to the benefit of nearly 500 employees across a variety of topics from health and safety to management skills. Seafarers have access to an equally broad range of trainings, exceeding the standards dictated by the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW). Across the Navios pool of seafarers<sup>2</sup>, over 42,500 online trainings have been completed and over 18,500 trainings hours undertaken ashore. These range from compulsory onboarding and safety topics, to resilience training. We received no MLC complaints for the year 2021.

Shoreside, we offer competitive employee benefits, support programmes for young professionals and, measures to reconcile career and family life. Routine performance reviews are undertaken and progression plans established accordingly.

**We believe that it is measures and developmental trainings such as these that allow us to report annual shoreside retention rates of 88% and annual crew retention rates of 97%.**

## Diversity and Inclusion

By seriously investing in the working conditions and Navios Holdings operates across a global network, crossing a great range and breadth of cultural relations. To us, diversity and inclusion is about treating people fairly, impartially, and without bias. We do not discriminate based on any sociodemographic characteristic, including gender, age, race, ethnicity, sexual orientation, disability, religion or belief, education, economic status, personality, communication style, or approaches to how people think and work.

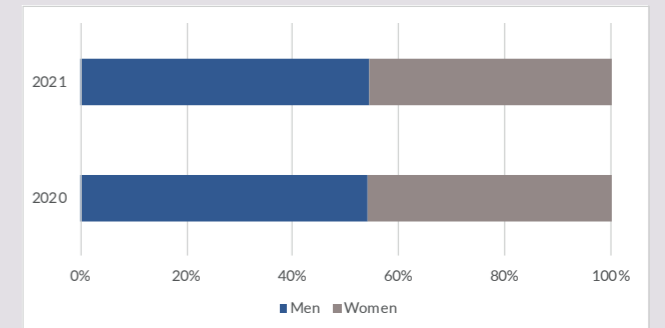
We are committed to ensuring that we have effective policies, strategies, procedures and processes and that we encourage behaviour that promotes equality, encourages diversity, and contributes to an inclusive organisational culture. By empowering our employees, we create an environment where we and our people triumph.

**We are proud to report that over 46% of our workforce are women, with 40% of our teams and departments headed by female managers.**

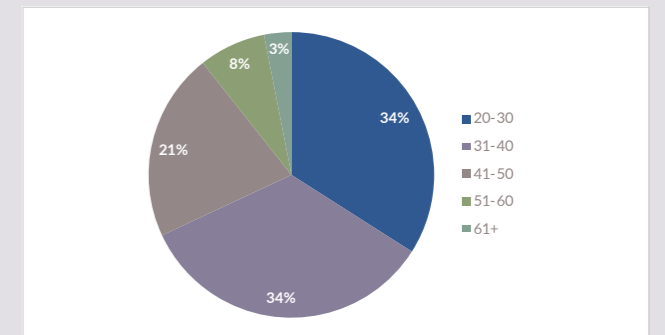
We believe that by creating a working environment that is welcoming of a wider range of backgrounds, we attract and retain the best people in the world.

<sup>1</sup> Health expenditures refer to the Greece office.

<sup>2</sup> NSM owns the entities providing ship management services to Navios Maritime Holdings' vessels (including technical maintenance, crewing, operations, quality, health, safety and environmental-related services) and employs all shoreside personnel providing these vessel management services. All seagoing employees that crew the vessels are sourced through third-party manning agents. They consist of one pool, and references are made to this collective pool.



NAVIOS SHORE STAFF



NAVIOS SHORE PERSONNEL AGE DISTRIBUTION



## Community Citizenship

In Navios Holdings' efforts to act as a responsible corporate citizen, we are committed to working as part of numerous initiatives and with several charities to promote healthier, better educated, and happier communities. Case studies of our charity work include:

### PROMOTING HEALTHY COMMUNITIES

Currently, we are supporting the in-vitro and clinical research of scientific institutions combatting neurodegenerative diseases. We also support the humanitarian efforts of local churches, which, during the COVID-19 pandemic, distributed food, hygienic supplies, and PPE. Ms. A. Frangou, the Navios Holdings CEO, co-funded a new, state-of-the-art ICU wing located at the General State Hospital of Nikea in the southwest part of the greater Athens area, near the port city of Piraeus.

### PROMOTING EDUCATED COMMUNITIES

Navios finances two research scholarships awarded by the Greek universities. The scholarships allow recipients to explore the topics of digitalisation, sustainability, and value creation in the shipping industry.

### PROMOTING THE FUTURE OF OUR COMMUNITIES

We are a proud contributor to SOS Children's Villages. Since 1949, SOS Children's Villages has been striving to meet the needs and protect the interests and rights of children. The organisation's work focuses on abandoned, destitute, and orphaned children requiring family-based childcare.



ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ  
ΝΙΚΑΙΑΣ ΠΕΙΡΑΙΑ

## PROMOTING CARE FOR OUR WATERS

As responsible stewards of the environment, we actively seek involvement in initiatives and organisations that share our environmental commitments and ambitions. Our sponsorship of the North American Marine Environmental Protection Association (NAMEPA) has aided the promotion of sustainable marine best practices and helped the education of seafarers, students and the public about the need and strategies for protecting global ocean, lake and river resources.

NAMEPA has seven key objectives relating to:

1. Encouraging effective compliance amongst members;
2. Communicate environmental awareness to seafarers and the public;
3. Create and promote safety mindedness and security spirit;
4. Enhance standard and professional competence throughout the industry;
5. Cooperate with international organisations;
6. Promote partnerships with educational institutions;
7. Publicly recognise individuals, associations, companies and other organisations demonstrating outstanding achievements.



# GOVERNANCE

## Transparency and Corporate Governance

It all starts with Governance. This is how Navios Holdings identifies, articulates, and manages risks—from operational and financial risks, to climate and political. Strong governance systems are fundamental to strong business resilience. Our governance structures are undoubtedly strong. We have robust committees to ensure full and frank oversight of our activities, as well as compliance with all applicable frameworks. It is our ambition to be the best operator in the industry.

- ELEVATING BUSINESS ETHICS TO THE TOPMOST TENET GUIDING OUR OPERATIONS
- COMPLIANCE THROUGH AUDITED POLICIES AND PERIODIC TRAINING
- SUPPORT FOR EMPLOYEES AND OTHERS WHO REPORT NON-COMPLIANCE
- ACCOUNTABILITY FOR COUNTERPARTIES



## Corporate Governing Policies

Navios Holdings is governed by policies, systems, and processes that are designed to facilitate and verify the agile and transparent functioning of our company. These are the tools and frameworks that allow Navios Holdings to conduct all operations with the integrity on which we have built our reputation. Respect for the environment, our people, the law, and our stakeholders is absolutely paramount to our success.

Environmental protection has long been a focus of the maritime transportation industry, being particularly heavily regulated since the introduction of the MARPOL Convention in 1978. However, as of late, this landscape has changed drastically, with a heavy focus on organisation transparency. As part of engaging with our industry and beyond, Navios Holdings is working to develop our capacity and capability to maintain alignment with newly developing regulatory and reporting frameworks.

Possibly the most significant sustainability-related disclosure regulation to date, the Corporate Sustainability Reporting Directive proposal was presented by the European Commission as part of the European Green Deal and Sustainable Finance Agenda. Expected to be enforced from 2023 onwards, Navios Holdings is taking steps to understand and build capacity to comply with any new reporting requirements and standards.

This is our goal and these structures will ensure we achieve it.

## BUSINESS ETHICS

Describing our approach to business ethics is our formalised Code of Corporate Conduct and Ethics document. This has been formally adopted by the Board of Directors and applies to all employees, including shore staff and seagoing personnel, setting out the minimum requirements expected of them.

The Code, among other things, requires compliance with all laws applicable to the company or its business; advises avoidance of conflicts of interest; prohibits acceptance of improper payments, as well payments or gifts to government officials; promotes fair dealing; forbids insider trading; advises on retention of certain documents, as required; and perhaps most importantly, rules out any retaliation, reprisal, or adverse action to be taken against any employee for reporting a suspected violation, issue, or concern arising under the Code.

This is bolstered, supported, and expanded by top-tier corporate policies, including the Economic Sanctions Compliance Policy; the Anti-Bribery & Anti-Corruption Policy; the Employee Internet Use Monitoring & Filtering Policy; the Information Technology Security and Password Policies, as well as the accompanying Code of Conduct; the Insider Trading Policy; and the Employee Confidentiality, Non-Compete & Non-Solicitation Agreement.

## PRIVACY AND DATA SECURITY

Privacy and data security is crucial to our operations. The risk of security breaches is one that we take serious measures to safeguard against, implementing best practices in line with BIMCO recommendations and by utilising high-quality operating systems. Our systems are regularly reviewed and updated as appropriate. We are fully compliant with the E.U. General Data Protection Regulation (GDPR).

## REGULATORY COMPLIANCE

Navios Holdings conforms to the highest standards of ethical conduct. All employees, at all corporate levels, are required to comply fully with all applicable laws and regulations, including, among others, the OECD Convention, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, all U.S. Securities and Exchange Commission (SEC) requirements, and applicable tax laws of the countries in which we have a relevant business presence. We also aim to maintain all ISO certifications achieved to date.

## ANTI-BRIBERY & ANTI-FACILITATION PAYMENT COMPLIANCE

All acts of bribery or corruption in any jurisdiction are strictly prohibited. The company has adopted a zero-tolerance policy against any actual or attempted act of bribery or corruption in any jurisdiction by any level employee. Navios has implemented detailed internal accounting and recordkeeping procedures that are capable of detecting and preventing improper payments, to ensure continued compliance. The procedures require that all significant expenditures come with reasonable assurances that (i) payments and transactions are executed appropriate authorisation; (ii) are accompanied by adequate detail and information; and (iii) are accurately recorded in conformity with U.S. or other applicable GAAP. These expenditures are regularly audited by internal and external auditors.

## SANCTIONS COMPLIANCE & COUNTERPARTY ACCOUNTABILITY

Navios Holdings is committed to compliance with applicable national and supranational legal regimes that govern economic sanctions against certain countries, entities, groups, individuals, and designated vessels. In this respect, we are guided by and fully compliant with U.S., EU, and UN sanctions regimes. What's more, we have procedures in place designed to ensure that our commercial partners—including contractors, vendors, and customers—observe similar compliance standards.

Accordingly, we have adopted thorough and granular due diligence measures designed to prevent not only intentional, but also unintentional, sanctions violations. A custom risk-assessment matrix was prepared for the purpose of monitoring and screening all our at-risk operations, including supply sourcing, port operations, third-party business transactions, and vessel sales and purchases.



We also devote significant resources to ensuring that the cargoes loaded onboard our vessels are sanctions-compliant. Our vessels do not trade in sanctioned regions; our charterparties contain air-tight sanctions compliance clauses; and, out of an abundance of caution, we check and verify relevant counterparties against sanctions databases, track AIS transmission data, screen cargo origins and destinations, and employ vessel tracking software to verify past trading.

## WHISTLEBLOWING AND OPEN REPORTING

The company expects full compliance with all applicable laws, rules, and regulations at all times; any suspected or possible violation of any applicable law, rule, regulation or company policy must be timely reported to the shoreside office; and the company has established several different means for crew members to raise their concerns anonymously and without fear of reprisal.

Open reporting, free from any concern that the company will take any adverse action for a report or inquiry submitted timely and in good faith, is embedded in our governance scheme. For all employees, it is set forth in the Code of Corporate Conduct & Ethics, and for shipboard personnel, it is set out in a standalone policy prominently placed in common areas onboard each vessel and reinforced at fleet-wide crew forums held around the world at regular intervals.

The respective policies provide instructions and means for reporting concerns, anonymously or otherwise, to appropriate personnel, a dedicated email address, or, for crew, an open reporting hotline. All means of reporting are constantly monitored, and all reports received are fully investigated, with outcomes of such investigations shared with the reporting individual, as appropriate.

## Compliance Training

All the corporate codes, policies, and procedures in the world will do nothing to ensure a safe or compliant work environment if all stakeholders are not aware of what is expected of them and are not impressed with the core tenets and values of the company. It is for this reason that Navios Holdings' policies are living, breathing documents—reviewed continually, amended as needed, and imparted on stakeholders regularly and effectively.

Each policy is given to all new employees in hardcopy format and reviewed one-on-one with a Human Resources (HR) representative along with a Human Resources Manual. Office-wide and department-specific refresher trainings in the appropriate policies are offered as both a means of reminding staff of their importance and an opportunity to raise questions and concerns.

For crew, Navios Holdings closely engages with local agents in the jurisdictions from which crew members are sourced to impart similar policy training as that received by shore staff. Navios Holdings' staff audit these local agents and trainings at least annually. To ensure that the trainings are not conducted once and forgotten, Navios also hosts fleet-wide crew forums for officers and ratings in the countries from which we draw the majority of our seafarers. The Pandemic has forced us to move temporarily to virtual forums, but the topics of discussion remain the same. Each forum reviews topical and timely issues facing seafarers, but office representatives also impart on the attendees at each forum the company's tenets of compliance.



## Our Managers, Directors and Officers

	Audit Committee	Compensation Committee	Nominating and Governance Committee
<b>Efstathios Loizos</b>	Chair Audit Committee	Chair Compensation Committee	
<b>Spyridon Magoulas</b>	Audit Committee	Compensation Committee	Nominating and Governance Committee
<b>George Malanga</b>	Audit Committee		Nominating and Governance Committee
<b>John Stratakis</b>		Compensation Committee	Chair Nominating and Governance Committee

### Audit Committee

The Audit Committee is responsible for (i) reviewing the Company's controls over financial reporting, (ii) making recommendations to the BoD on the engagement of the Company's auditors, (iii) reviewing all related party transactions for potential conflicts of interest.

### Compensation Committee

The Compensation Committee is mainly responsible for recommending to the BoD, the Company's senior executive officers' compensation and benefits.

### Nominating & Governance Committee

The Committee is responsible for (i) recommending to the Board of Directors nominees for Director or Committees of the BoD, (ii) advising the BoD about corporate governance best practices.

### BOARD OF DIRECTORS for the year ended 2021

**Angeliki Frangou**  
Director

**Vasiliki Papaefthymiou**  
Director

**Shunji Sasada**  
Director

**Spyridon Magoulas**  
Director

**John Stratakis**  
Director

**Efstathios Loizos**  
Director

**George Malanga**  
Director

**Michael Pearson**  
Director

### EXECUTIVE OFFICERS for the year ended 2021

**Angeliki Frangou**  
Chairwoman of the Board and Chief Executive Officer

**George Achniotis**  
Chief Financial Officer

**Ted C. Petrone**  
Vice Chairman of Navios Corporation

**Vasiliki Papaefthymiou**  
Executive Vice President, Legal, Secretary

**Anna Kalathakis**  
Chief Legal Risk Officer

**Shunji Sasada**  
President of Navios Corporation

**Efstratios Desypris**  
Chief Financial Controller

**Ioannis Karyotis**  
Senior Vice President, Strategic Planning

**Erifili Tsironi**  
Senior Vice President, Credit Management

## Disclaimer

In this report, the Company may make forward-looking statements or provide forward-looking information. All statements other than statements of historical facts should be considered forward-looking statements. Although such statements reflect the Company's current expectations, these statements are not guarantees of future performance, but involve risks, uncertainties, and assumptions which are difficult to predict.

This report is informed by metrics defined by the Sustainability Accounting Standards Board's (SASB) MARINE TRANSPORTATION: Sustainability Accounting Standard Sustainable Industry Classification System® (SICS®) TR-MT Prepared by the Sustainability Accounting Standards Board (October 2018), as well as taking into account relevant disclosure metrics set out by "Reporting for Signatories, United Nations: Principles for Responsible Investing (PRI) 2020." Supplementary disclosure metrics designed by Infrastructure Technical International Ltd (ITI).

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All information is assumed to be correct at time of publication. Some metrics have been calculated through engineering calculations. ITI Network accepts no responsibility for the truthfulness, or validity of the reported metrics.

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