



TTS
TRANSPORT TRADE SERVICES S.A.
BUCUREȘTI – ROMÂNIA



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ANNUAL EHS MONITORING REPORT

Reporting period: 01/01/2023 – 31/12/2023

Content

1.	Reporting framework.....	4
2.	Management Systems and performance standards	5
2.1.	Assessed and certified management standards:.....	5
2.2.	Organizational capacity and competence	5
2.3.	The 2023 objectives identified according to ISO 14001:.....	5
2.4.	Evaluation of environmental aspects.....	9
2.5.	Emergency Preparedness and Response	11
2.6.	Inspections	12
	Environmental inspections.....	13
2.7.	Relations with third parties	18
	Average diesel consumption of commercial fleet.....	19
	Total equivalent energy consumption of NAVROM fleet.....	20
4.	CO ₂ emissions NAVROM fleet.....	21
	CO ₂ emissions and CO ₂ emission intensity for the commercial fleet.....	21
	Total CO ₂ emissions for the NAVROM fleet	21
5.	Energy consumption within the monitoring perimeter - 2023	23
6.	CO ₂ Emissions within the Monitoring Perimeter - 2023.....	24
	Direct CO ₂ emissions – Scope 1 GHG.....	24
	Indirect CO ₂ emissions – Scope 2 GHG	25
	Total CO ₂ emissions.....	26
7.	Waste management.....	27
	Canopus	27
	TTS Fluvial	27
	TTS Operator.....	28
	Navrom.....	28
	Navrom Shipyard	29
	TTS 30	
8.	Working conditions.....	31
8.1.	Work relations.....	31
8.2.	Health and safety at work.....	32
8.3.	Occupational health and safety training.....	33
8.4.	Fire safety	34
8.5.	Work accidents	37
9.	Environmental protection	39
9.1.	Environmental permits and reporting obligations.....	39
	TTS Fluvial.....	39
	Canopus.....	40
	NAVROM Shipyard	40
	NAVROM.....	41

1. Reporting framework

Since 2012, TTS (Transport Trade Services) S.A. ("TTS") has implemented an internal system for monitoring the main aspects of environmental protection and occupational safety and health at the level of TTS Group.

This process is materialized through an Annual EHS Monitoring Report ("EHS Report") that documents how TTS and a number of subsidiaries with significant impact at the group level deal with the issues they face in terms of environmental protection, safety and health and emergency situations, as well as the calculation of emissions (Scope I & Scope II) resulting from the activities of the companies that are the subject of this document. The first report elaborated was the one regarding the year 2014.

EHS reports cover the periods from January 1 to December 31 of each year.

The beneficiaries of the EHS Report are the members of the management of TTS and of the monitored subsidiaries - AC and executive management - who thus have at their disposal a tool, based on which they can make all the necessary and useful decisions regarding the monitored areas.

In carrying out the monitoring and EHS Reports, TTS is assisted by TQ Consultanta si Recrutare SRL Galati, (<https://tqconsult.ro/>), a company accredited ISO 14065/2021 si ISO 17029/2020 by RENAR for the verification of gas emission reports with greenhouse effect and tonne kilometer data according to Regulation (EU) 2018/2067 (the "Consultant").

Date of report: 30.06.2024

Monitoring Perimeter

The companies covered by the 2023 EHS Report are the following:

Name	Main activities	Main and secondary headquarters
TTS (Transport Trade Services) S.A. ("TTS")	Shipment of goods	<u>Bucuresti</u> , Giurgiu, Oltenița, Bechet
CNFR Navrom S.A. ("Navrom")	Freight transport on inland waterways	<u>Galati</u> , Drobeta-Turnu Severin, Constanța
TTS Operator S.R.L. ("TTS Operator")	Handling	Constanța
TTS Porturi Fluviale S.A. ("TTS Fluvial")	Handling	<u>Galati</u> , Brăila, Drobeta-Turnu Severin, Giurgiu, Oltenița, Bechet
Canopus Star S.R.L. ("Canopus")	Handling	Constanța
NAVROM Shipyard S.R.L. ("NAVROM Shipyard")	Ship repairs	<u>Galati</u> , Cernavodă
Navrom Bac SRL ("Navrom Bac")	Freight and passengers transport on inland waterways	<u>Galati</u> , Isaccea

2. Management Systems and performance standards

2.1. Assessed and certified management standards:

	ISO 9001	ISO 14001	ISO 45001	ISO 22000
TTS	TIC 15100127867 31.01.2024-31.01.2027 (TÜV Thuringen)	No	No	No
Navrom	EN ISO 9001:2015 Nr. 20100233018217 TÜV AUSTRIA GmbH Viena	EN ISO 14001:2015 Nr. 20104233018218 TÜV AUSTRIA GmbH Viena	EN ISO 45001:2018 Nr. 20116233018219 TÜV AUSTRIA GmbH Viena	No
TTS Operator	RO001894/02.08.2022 Bureau Veritas Certification	RO001895/02.08.2022 Bureau Veritas Certification	RO001896/02.08.2022 Bureau Veritas Certification	No
TTS Fluvial	C00111-R issued on 10.11.2023 by BQ CERT	M00046-R issued on 10.11.2023 by BQ CERT	SM00033-R issued on 10.11.2023 by BQ CERT	SA00006-R issued on 10.11.2023 by BQ CERT
Canopus	In the process of implementation	In the process of implementation	In the process of implementation	No
NAVROM Shipyards	277120-2018-AQ- ROU-RvA, issued by DNV Business Assurance	277123-2018-AE-ROU- RvA, issued by DNV Business Assurance	209145-2016-AHSO- ROU-RvA, issued by DNV Business Assurance	No
Navrom Bac	No	ISO 14001:2015 No. 10605313/24.04.2024 LRQA Group Limited	ISO 45001:2018 Nr. 10605315/24.04.2024 LRQA Group Limited	No

2.2. Organizational capacity and competence

EHS managers in each company within the monitoring perimeter collect monitored information and periodically send it to the EHS manager at the group level, who, together with the Consultant, centralizes and prepares the EHS Report.

The EHS managers in the companies ensure that environmental, health, and safety policies are promoted and are concerned with meeting national legal environmental, health, and safety requirements (which, in most cases, represent transpositions of European legislation).

Additionally, in each company, a waste management officer is designated who is required, according to current legal requirements, to maintain monthly records of waste management, report quarterly to the group EHS manager, and annually to the competent local environmental authority.

2.3. The 2023 objectives identified according to ISO 14001:

Company	Objective	Term	Implementation measures	Accomplished
NAVROM	Prevention of accidental pollution with serious consequences caused by the company's ships	Permanent	Acquiring by the crews the roles of preventing and combating accidental pollution and carrying out practical training.	100%

<i>Company</i>	<i>Objective</i>	<i>Term</i>	<i>Implementation measures</i>	<i>Accomplished</i>
			<i>Equipping ships with the necessary facilities and materials for intervention in case of accidental pollution, including hydrocarbon absorbers .</i>	100%
	<i>Reductions of emissions</i>	<i>Permanent</i>	<i>Maintaining propulsion equipment within normal operating parameters;</i>	100%
			<i>Timing execution of revisions and repairs</i>	100%
			<i>The use of Euro 5 diesel or <0.1% Sulfur .</i>	100%
			<i>Modernization of the fleet of powered vessels and technical vessels, with the replacement of engines with new generation ones, with low emissions: floating crane 872 - Dec 2023</i>	100%
	<i>Selective collection of waste at company 's headquarters and branches and on board ships</i>	<i>Permanent</i>	<i>Providing the necessary equipment and materials;</i>	100%
			<i>Staff training</i>	100%
			<i>Signing contracts with authorized companies, for all categories of generated waste</i>	100%
			<i>Carrying out a waste audit and establishing the necessary measures to reduce the amount of waste generated - Sept 2023</i>	100%
	<i>Reducing the risks of pollution by the discharge of dangerous goods from transport ships</i>	<i>Permanent</i>	<i>Regular staff training with specialized courses</i>	100%
			<i>Inspection of vessels that are to transport dangerous goods by ANR, according to ADN requirements</i>	100%
	<i>Fulfillment of legal requirements and compliance obligations</i>	<i>Permanent</i>	<i>Permanent updating of the fund of normative acts in force regarding environmental protection. Communication to those interested, within a maximum of 10 days, of the new modified rules</i>	100%
			<i>Understanding the needs and expectations of the interested parties and fulfilling their requirements.</i>	
		<i>Sep 2023</i>	<i>Annual analysis (during the internal audit)</i>	

<i>Company</i>	<i>Objective</i>	<i>Term</i>	<i>Implementation measures</i>	<i>Accomplished</i>
			<i>and updating the list of environmental aspects</i>	
<i>TTS Fluvial</i>	<i>Efficient utilization of waste</i>	<i>Permanent</i>	<i>Staff training on how to collect and store waste</i>	<i>100%</i>
	<i>River water collection</i>	<i>31.05.2023</i>	<i>Replacing silo gable gutters</i>	<i>Rescheduled 2024</i>
	<i>Reduction of losses when handling port cranes</i>	<i>31.12.2023</i>	<i>Grapple repairs (target - 1 grapple)</i>	<i>100%</i>
	<i>Reduction of losses at grain reception</i>	<i>31.03.2023-30.09.2023</i>	<i>Replacing reception ramp roofs (target R2 and R4)</i>	<i>Rescheduled 2024</i>
	<i>Responsible and safe disposal of waste</i>	<i>As many times as needed</i>	<i>Delivery of waste resulting from the exploitation of ships to authorized companies.</i>	<i>100%</i>
	<i>Selective waste collection</i>	<i>31.12.2023</i>	<i>Delivery of waste resulting from the activity carried out at the headquarters (paper + cardboard, plastic packaging, etc.) to authorized companies</i>	<i>100%</i>
<i>TTS Operator</i>	<i>Monitoring waste management, reducing and recovering them</i>	<i>Annually</i>	<i>- personal training - delivery of waste to specialized units, record of waste management according to legislation and reporting to ANM</i>	<i>100%</i>
	<i>Identifying and keeping under control all environmental aspects resulting from the activity of TTS OPERATOR</i>	<i>Permanent</i>	<i>Evaluation of environmental aspects and compliance with legislation.</i>	<i>100%</i>
<i>Navrom Shipyard</i>	<i>Establishing and applying operational intervention measures to prevent and/or limit the effects on the environment in case of accidents or disasters</i>	<i>Permanent</i>	<i>Emergency situations/ incidents/ Environmental accidents produced per year =0 No. Simulations of emergency situations and response/planning capacity=1</i>	<i>100%</i>
	<i>Improving waste management by reducing, recovering, recycling and/or eliminating them, paying particular attention to hazardous waste</i>	<i>Permanent</i>	<i>Contracts concluded with specialized companies (licensed for hazardous waste collection) in handing over waste for each type of waste</i>	<i>100%</i>
	<i>Monitoring of environmental factors</i>	<i>Permanent</i>	<i>The number of parameters related to the measurements / monitoring carried out for each one separately, without exceeding the admissible limits.</i>	<i>100%</i>

<i>Company</i>	<i>Objective</i>	<i>Term</i>	<i>Implementation measures</i>	<i>Accomplished</i>	
	<i>Identification of all legal provisions and other requirements regarding the environment related to the activities carried out</i>	<i>Permanent</i>	<i>The number of non-conformities detected during the conformity assessment should be decreasing or zero, compared to the previous data</i>	<i>70%</i>	
	<i>Ensuring a suitable working environment and reducing risks, drawing up the program of PSI measures and implementing it.</i>	<i>Permanent</i>	<i>No. of PSI means (fire extinguishers, etc.) loaded and checked/no. PSI extinguishing media required</i>	<i>100%</i>	
	<i>Emergency preparedness and response capacity</i>	<i>permanent</i>	<i>Identification of emergency situations with an impact on the environment, development of a plan and training for the ES</i>	<i>100%</i>	
<i>CANOPUS</i>	<i>Efficient utilization of waste</i>	<i>Permanent</i>	<i>Staff training regarding the way the waste is collected and stored</i>	<i>100%</i>	
	<i>Responsible and safe disposal of waste</i>	<i>As many times as needed</i>	<i>Delivery of waste resulting from the exploitation of ships to authorized companies.</i>	<i>100%</i>	
	<i>Selective waste collection</i>	<i>31.12.2023</i>	<i>Delivery of waste resulting from the activity carried out at the headquarters (paper + cardboard, plastic packaging, etc.) to authorized companies</i>	<i>100%</i>	
<i>TTS</i>	<i>Establishing legal and regulated requirements</i>	<i>permanent</i>	<i>Permanent updating of the documentary fund with the normative acts in force</i>	<i>100 %</i>	
	<i>Identification and evaluation of environmental aspects</i>	<i>Decembrie 2023</i>	<i>Annual analysis and updating of the list of environmental aspects</i>	<i>100 %</i>	
	<i>Competence, training and awareness</i>	<i>Annual planning</i>	<i>Informing employees about the rules and internal regulations on environmental protection</i>	<i>100 %</i>	
	<i>Environment protection</i>		<i>permanent</i>	<i>Selective collection and recovery of waste -</i>	<i>100 %</i>
			<i>March 2023</i>	<i>Waste management reporting to APM Bucharest</i>	<i>100 %</i>
		<i>Permanent</i>	<i>Compliance with the equipment/machinery maintenance schedule</i>	<i>100 %</i>	
		<i>Permanent</i>	<i>Reducing electricity consumption by installing economical bulbs and neon lights</i>	<i>100 %</i>	

Company	Objective	Term	Implementation measures	Accomplished
		December 2023	Reducing emissions - the purchase of hybrid cars.	100 %
Navrom Bac	Prevention of accidental pollution with serious consequences caused by the company's ships	Permanent	Acquiring by crews the roles of preventing and combating accidental pollution and carrying out practical training Equipping ships with the necessary materials for intervention in case of accidental pollution, including hydrocarbon absorbers	100%
	Reductions of emissions	Permanent	Maintaining propulsion equipment within normal operating parameters; Timing execution of revisions and repairs The use of Euro 5 diesel or <0.1% Sulfur	100%
	Selective collection of waste	Permanent	Providing the necessary equipment and materials; Staff training Signing contracts with authorized companies, for all categories of generated waste	100%
	Reducing the risks of pollution by the discharge of dangerous goods	Permanent	Regular staff training with specialized courses	100%

2.4. Evaluation of environmental aspects

Company	Insignificant Aspects	Significant Aspects	Details on the significant environmental aspect	Measures for keeping under control
TTS	7	0	-	-
NAVROM	23	1	Transport of dangerous goods on inland waterways	Training the staff with expert courses in the transport dangerous goods (DNA) Preparation of ships involved in the transport of dangerous goods, as required by DNA Acquiring and compliance with procedure PO-19 regarding transport of dangerous goods Acquiring and compliance with the Accidental Pollution Prevention and Control Plan (PS-01) and the Security Plan High risk goods transport (PS-02)

<i>Company</i>	<i>Insignificant Aspects</i>	<i>Significant Aspects</i>	<i>Details on the significant environmental aspect</i>	<i>Measures for keeping under control</i>
TTS Operator	5	2	Earthquake, floods, storms, blizzards, abundant rainfall, drought that could cause material or human lives damage, and environmental pollution	1.Reporting the event 2.Alarming the intervention teams 3.Fast intervention for stopping, spreading, saving lives 4.Collaboration with authorities and investigate the causes
TTS Fluvial	201	27	23- risk/explosion generation with impact on human health in emergencies 1-- management of ship bilge water 3- water pollution with oil/ship fuel in emergency situations	- monitoring handled, stored grain's quality; - monitoring preventive maintenance programme and technical equipment repair plan; - handing over bilge water to authorized agents whenever needed (APDM).
Navrom Shipyard	-	122	Abrasive suspension deposits	Specific measures managed by specialized personnel using monitoring and neutralization means.
	-	61	Slag deposits	
	40	-	Residual leaks	
	30	-	Paint packaging (soil pollution, noxious release)	
	-	85	Abrasive suspensions from polishing	
	-	57	Autogenous and electric welding's gas emissions	
	-	85	Suspensions of oxides in the air from autogenous cutting	
	42	-	Leaks of oil residues from piping installations	
	-	61	Leaks of emulsions and oils from chipping processing	
	-	62	Suspensions in the air appeared during the cleaning of the hull of the ship on dock	
	42	-	Gases resulting from anti-corrosion protection	
	30	-	Slag resulting from electric welding	
Navrom Bac	10	4	Risk of pollution with fuels, exhaust gases, bilge water and hydrocarbon residues	Handing over to the specialized units the residues from the board of the ships whenever needed, keeping the ships in optimal working condition by carrying out planned interventions, training the staff by carrying out specialization courses,

Company	Insignificant Aspects	Significant Aspects	Details on the significant environmental aspect	Measures for keeping under control
				equipping the ships with quick intervention materials.
Canopus	<ul style="list-style-type: none"> - 6 environmental aspects with score < 14 - 3 environmental aspects with a score of 14 	Following the evaluation of the environmental aspects, no significant environmental aspects resulted. The aspects that recorded the highest score will be followed.	<ul style="list-style-type: none"> - 2 aspects - generation of fire/explosion risk in office/store/cell buildings with impact on human health in emergency situations - 1 aspect - generation of waste water with an impact on human health, accidental water pollution 	<ul style="list-style-type: none"> - Monitoring preventive maintenance program and repair plan for technological equipment in the terminal - Periodic verification of the fire detection system in the building with offices/grain warehouses - Monitoring of waste water by taking samples and analyzing them by an authorized laboratory.

2.5. Emergency Preparedness and Response

	Emergency Situation Plan	Emergency Situation Training Plan	Proof of training
TTS	<i>Emergency Situation Intervention Plan</i>	<i>Annual training Programme no. 212/28.12.2022</i>	<i>Individual training sheets on the line of fire protection and emergency situations</i>
Navrom	<ul style="list-style-type: none"> - Security plan PS-03: Protection measures for emergency situations; - Procedure PO-43-ES: regarding the organization of activities in the field of emergency situations; - IP-35-ES: Organization and conduct of fire protection activity 	<i>Procedure PO-44-ES: Training of workers in the field of emergency situations</i>	<i>Individual training sheets in the field of emergency situations;</i>
	<i>Crew Roles apply on board ships for emergency situations (Fire, Man overboard, Waterhole (damage), Abandonment).</i>	<i>Provision A21-7345/2021: conducting emergency drills on board ships .</i>	<ul style="list-style-type: none"> -entry in the ship's Activity Log; - photos or video recordings during the exercise
TTS Operator	<i>Fire intervention plan</i>	<i>Training program 2023</i>	<i>ES/PSI 2023 training sheet</i>
NAVROM Shipyard	<i>Intervention plan for emergency situations, entered into force in 2018</i>	<i>Emergency training plan</i>	<i>Training minutes</i>
TTS Fluvial	<i>Fire intervention plans approved by ISU for the operated ports: Galati, Brăila, Drobeta-Turnu Severin, Giurgiu, Oltenita</i>	<i>Annual training program</i>	<i>Individual training sheets for fire protection and emergency situations</i>

	Emergency Situation Plan	Emergency Situation Training Plan	Proof of training
NAVROM Bac	<i>Fire protection instructions</i>	<i>Training program</i>	<i>Training sheets</i>
Canopus	<i>Internal plan of action and intervention in emergency situations no. 1/rev. 5/2023</i>	<i>Annual training program</i>	<i>Exercise reports Training sheets in the ES field</i>

2.6. Inspections

Emergency situations inspections

Company	Emergency situations inspections	The results of inspections	Achievement/Follow-up actions
TTS Fluvial	Control report from 04.07.2023-ISU „Drobeta” Mehedinti	<p>Warnings for the following non-conformities:</p> <p>The meeting places of the users are not marked in case of fire;</p> <p>Unoccupied Land surfaces by constructions are covered by dry vegetation that has not been collected and evacuated;</p> <p>The fire protection instructions, specific to each sector of activity with fire risk, were not drawn up according to the framework provided in the General Fire Protection Norms;</p> <p>Periodic own controls were not planned and executed in order to detect, know and remove any dangerous conditions that may favor the initiation or development of fires;</p> <p>The electrical installation is operated without complying with the technical rules regarding the protection of electrical contactors against combustible materials (electrical extension cord pictured on the wooden door frame) and it has not been checked periodically with a certified legal entity.</p> <p>Some of the technical means of fire protection with which the buildings are equipped (external fire hydrants) are not marked.</p>	<p>100%</p> <p>Address no .996TTSPFTS/13.07.2023 for remediation the non conformities sent to ISU „Drobeta” Mehedinti</p>
C.N.F.R. NAVROM S.A. Galați – suc. Drobeta	15.05.2023-Fire protection control	<p>Five irregularities found.</p> <p>Warning applied to the PSI responsible.</p>	The detected irregularities were promptly remedied (8 days).
C.N.F.R. NAVROM S.A. Galați	10.11.2023- Control regarding fire protection and civil protection	<p>Four irregularities found.</p> <p>Warning applied to the head of the SIPP.</p>	Plan of measures I23-378/24.11.2023
NAVROM Shipyard	Intervention (minute no.	The electric current distribution board was on fire with the possibility of propagation to the other adjacent	

<i>Company</i>	<i>Emergency situations inspections</i>	<i>The results of inspections</i>	<i>Achievement/Follow-up actions</i>
	312/27.08.2023)	electrical boards.	
	Finding and sanction (minute no. 16007 /13.10.2023)	<p>1. The execution of the training is not certified (the training sheets were not signed)</p> <p>2. The appropriate equipment of all containers with approved and certified first aid technical means is not ensured;</p> <p>3. The LPG supply installation for the welding machines is operated with major deficiencies in terms of user safety (there were gas leaks at the quick couplers)</p> <p>4. LPG and propane cylinders with a capacity of 70 l and 35 l are stored in improper conditions (they were lying down and not anchored;</p> <p>The security distances between the LPG storage tank (quantity 5000 l) and the foremen's barracks are not respected</p>	<p>Closed - Warning</p> <p>Closed - Warning</p> <p>Closed - Fine</p> <p>Subcontracting company - DIAGEO</p>
	Minute no. 5624/07.11.2023	Organizational, training, technical irregularities	Closed-Warning
S.C. NAVROM BAC S.R.L.	Minute no.1928677	<p>The evacuation plans do not include details regarding the location of fire extinguishers.</p> <p>The provision of appropriate fire protection measures is not regulated.</p> <p>There are no fire protection instructions displayed in the workplaces.</p> <p>Smoking areas are not demarcated.</p> <p>The periodicity of the training for the first intervention teams is not respected.</p> <p>The escape routes are not properly marked.</p> <p>Improvisations in the electrical installation.</p> <p>Missing gas detector technical room.</p>	The detected irregularities were closed within 30 days.

Environmental inspections

<i>Company</i>	<i>Environmental inspections</i>	<i>Results</i>	<i>Follow-up actions</i>
CANOPUS STAR	Finding note no. 522/18.05.2023	Non-conformities according to Finding Note no. 522/18.05.2023	<p>Answer to National Environmental Guard C-ta.- Address no. 124/06.06.2023</p> <p>All non-conformities resolved through inspection reports and internal procedures.</p>
	Finding note no. 1484/27.12.2023	Non-conformities according to Finding Note no. 1484/27.12.2023	<p>Answer to National Environmental Guard C-ta.- Address no. 01/03.01.2024</p> <p>All non-conformities resolved through inspection reports and internal procedures.</p>

Company	Environmental inspections	Results	Follow-up actions
Navrom	31.07.2023- Inspection from Environmental Guard Galati	No sanctions were applied. An irregularity regarding the storage of used oils.	The used oils stored on the platform were handed over to APDM Galati.
	22.09.2023-Inspection from Environmental Guard Mehedinti at terrace „Vraja Dunării”	No sanctions were applied. Documents have been requested.	The requested documents were sent promptly (10 days)
	29.09.2023-Inspection from Environmental Guard at „Grivița 1” tank	No sanctions were applied. Documents have been requested	The requested documents were sent promptly (7 days)
S.C. NAVROM BAC S.R.L.	Finding note 248/22.05.2028	Unplanned control regarding the waste brought by the waters on the bank of the I.C. Bratianu. No sanctions were applied	The area was sanitized and on the banks were mounted warning signs regarding the ban on throwing waste.
Navrom Shipyard	Environmental Guard Finding note no.161/07.08.2023	Environmental monitoring Waste management method Management of hazardous substances and hazardous waste	Closed

Inspections from Labor Authorities

Company	Inspection report	Inspection Results	Achievement/Follow-up
TTS Fluvial	Report series BR no. 30379/19.05.2023-ITM BRAILA - Control action regarding the verification of the minimum requirements for safety and health at work for the activities involving the use of port cranes, NACE code 5222; 5224; 5210; 50	Verbal warning for the following non-conformities: - the record register of the gantry crane with registration number ISCIR G 4719 is not completed up to date; - on the port platform, the traffic routes of vehicles transporting general goods are not properly highlighted; - the indicator plate on the gantry crane with no. ISCIR G 4719 which includes the nominal lifting load, no. of manufacture, is not sufficiently visible.	100% Address no. 1144TTSPFBR/29.05.2023 for remedying the irregularities found in report no. 30376/19.05.2023, sent to ITM BRAILA
	Report series CL no. 36434/30.05.2023-ITM CALARASI - Control action regarding the verification of the minimum requirements for safety and health at work in the activities involving the use of port cranes - NACE code 5224 -	Verbal warning for the following non-conformities: - the safety and health signage at the workplace, including the one related to the fuel tank with the 19652 series, is deficient; - from the documents presented to the control, it does not appear that the unit issued decisions regarding the designation of workers who provide medical first aid.	100% Address no. 50TTSPFOT/15.06.2023 to resolve the non-conformities found in report 36434/30.05.2023, sent to ITM CALARASI
	Report series BR no. 30397/17.07.2023-ITM	The employer complies with the requirements stipulated in O.U.G. no. 99/2000 regarding the	-

<i>Company</i>	<i>Inspection report</i>	<i>Inspection Results</i>	<i>Achievement/Follow-up</i>
	<p>BRAILA</p> <p>- Verification of compliance with the provisions of OUG 99/2000</p>	<p>measures that can be applied in periods with extremely high temperatures.</p>	
	<p>Report series BR no. 31256/01.08.2023-ITM BRAILA</p> <p>- Control action regarding the verification of the minimum safety and health requirements at work for the activities involving the use of port cranes NACE code 5222, 5224, 5210, 50 - Stage 2 (verification of the implementation of the measures arranged in the previous control)</p>	<p>Following the verification of the existing documents at the registered office/work point and the situation on the ground at SC TTS PORTURI FLUVIALE SRL GALATI-Braila Branch, the following were found:</p> <ul style="list-style-type: none"> - the gantry crane supervision register with registration number ISCIR G4719 was completed up to date; - the traffic routes of vehicles transporting goods on the port platform were delimited and appropriately sized on the port platform, ensuring a safe and adequate access for the workers located in the vicinity of these traffic routes and for the machines that serve the port activities; - on the gantry crane with no. of registration ISCIR G 4719, the mounting of the indicator plate with its identification data (nominal lifting load, manufacturing no.) was ensured. 	-
	<p>Report series CL no. 37665/12.10.2023-ITM CALARASI</p> <p>- Control action regarding the verification of compliance with the minimum safety and health requirements at work in the activities that involve the use of port cranes - NACE 5222, 5224, 5210, 50 - Verification of the fulfillment of measures ordered by Report 36434/ 30.05.2023</p>	-	-
	<p>Report series GL no. 3617/01.08.2023 for stopping work equipment conveyor belt 1 grain silo Port Galati</p>	<p>Conveyor belt no. 1 from the Port Galati grain silo is not provided with protective devices for moving elements.</p> <p>Above the lower part of the conveyor belt is a plank used by workers as a place to cross the belt.</p>	<p>100%</p> <p>Address no. 3230TTSPF/ 02.08.2023 information ITM Galati ref. measures taken to put conveyor belt 1 in the Port Galati grain silo back into operation</p>
S.C. NAVROM BAC S.R.L.	<p>Report 84093/06.12.2023</p>	<p>The compliance with the legislation in the field of labor relations / safety and health at work was verified. No measures have been</p>	

<i>Company</i>	<i>Inspection report</i>	<i>Inspection Results</i>	<i>Achievement/Follow-up</i>
		<i>established.</i>	
NAVROM	<i>Galati: 13.02.2023 - control following a work event - Ropotan Costel drowned</i>	<i>Contravention fine of 8,000 lei</i>	<i>Paid</i>
	<i>Galati: 07/05/2023- Control following a work event-accident Chirilă Mircea</i>	<i>Contravention fine of 5,000 lei</i>	<i>Paid</i>
	<i>Constanta: 02.10.2023- Control regarding compliance with the OSH legislation</i>	<i>No deficiencies were found</i>	-
	<i>Drobeta: 02.10.2023- Control regarding compliance with the OSH legislation</i>	<i>No deficiencies were found</i>	-

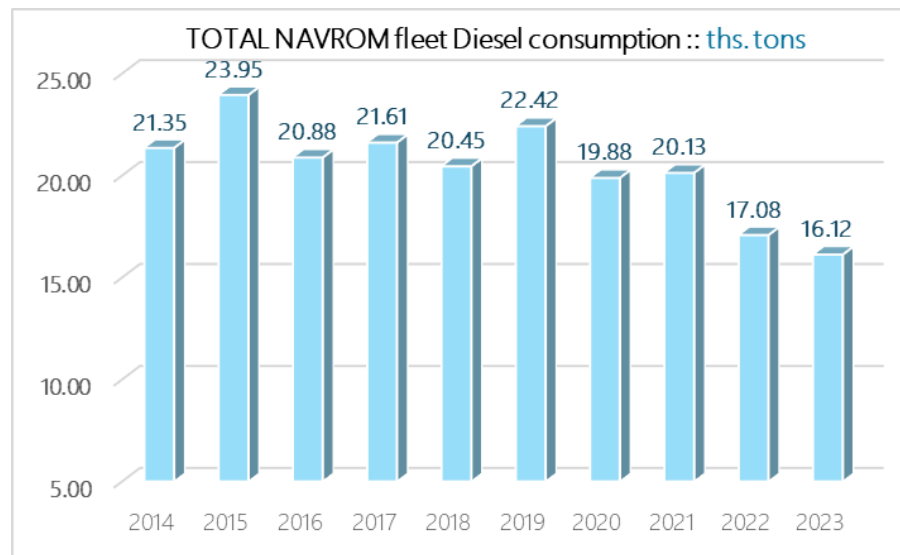
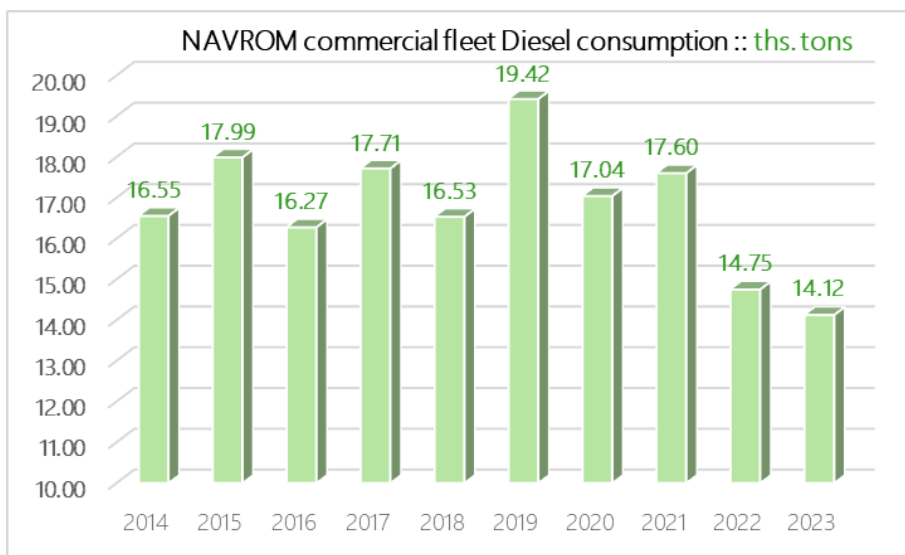
Audits

Company	Internal Audit	Nonconformities/Observations	Termen	External Audit	Nonconformities/Observations/Recommandations	Termen
Navrom	29.08-13.09.2023	Non-conformities: 0 Observations: 46 (a plan of measures for remediation has been drawn up)	Dec. 2024	18.10 and 07.11.2023	Non-conformities: 0 Observations: 34 (a plan of measures for remediation has been drawn up)	Dec. 2024
TTS	Internal Audit report	for CANOPUS: - Periodic maintenance and cleaning of equipment/machinery and external spaces. - Compliance with the provisions of the work procedure regarding the maintenance of cleanliness and maintenance of the dust removal installation. for TTS: - Continue steps to obtain the fire authorization according to HG no. 571/2016, for the TTS headquarters.	Dec 2024	External audit	-	
TTS PORTURI FLUVIALE S.R.L.	28.07.2023 - 02.08.2023	-		23.08.2023 - 25.08.2023 Recertification audit	In the audit report, based on the findings of the audit team and the objective evidence taken from a representative sample, no observations/nonconformities were formulated. There is the possibility that there are non-conformities in the system not detected by the audit team, which the organization has the obligation to identify and remove by applying the processes of verifying the operation of its own management system and continuous improvement.	-
TTS Operator	24-25.05.2023	Nonconformities: 0 Improvement proposals: 9 (can be found in the Annex to the Internal Audit Report)	-	26-28.07.2023	Nonconformities 0 Improvement opportunities: 5 (found in the audit report issued by Bureau Veritas Certification)	
Navrom Shipyard	Internal audit raport	-	-	7-8.02.2023	Nonconformities: 6 Notes: 1 (found in the document RO_NAVROMSHIPYARD_IA_RC_LIST OF FINDINGS, issued by DNV Buiness Assurance Romania)	2024

2.7. Relations with third parties

Company	Concerns			
	Community	Neighbours	Clients	Providers
TTS	No	No	No	No
Navrom	No	No	24 complaints: - 11 regarding depreciated goods quantities (of which 8 without claims); - 2 regarding cargo shortages at unloading (unconfirmed); - 6 for ships unfit for loading (repaired on the spot); 3 regarding maneuver delays.	No
TTS Operator	No	No	No	No
TTS Fluvial	No	No	No	No
Canopus	No	No	No	No
Navrom Shipyard	No	No	No	No
Navrom Bac	No	No	No	No

3. Diesel Consumption NAVROM Fleet

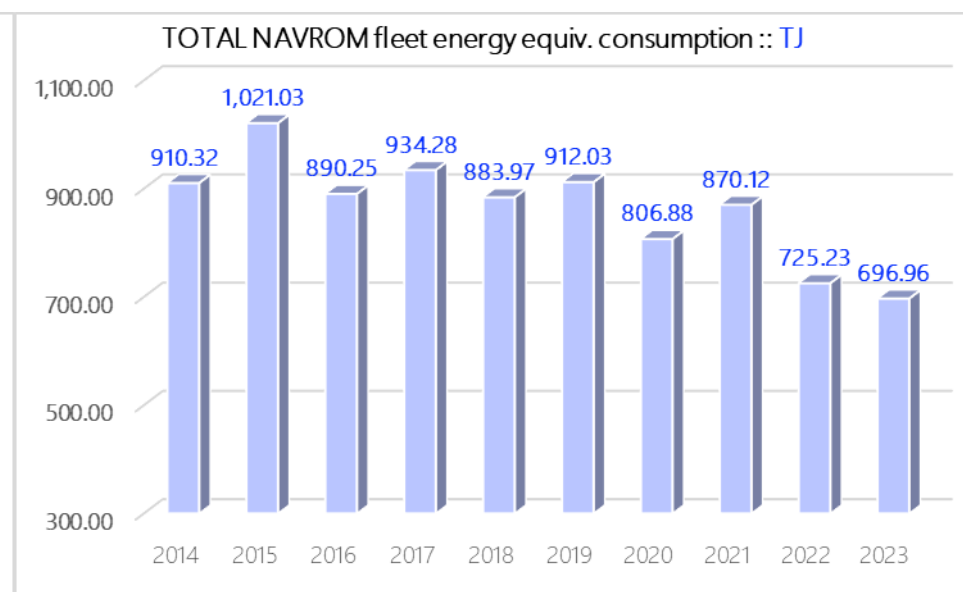
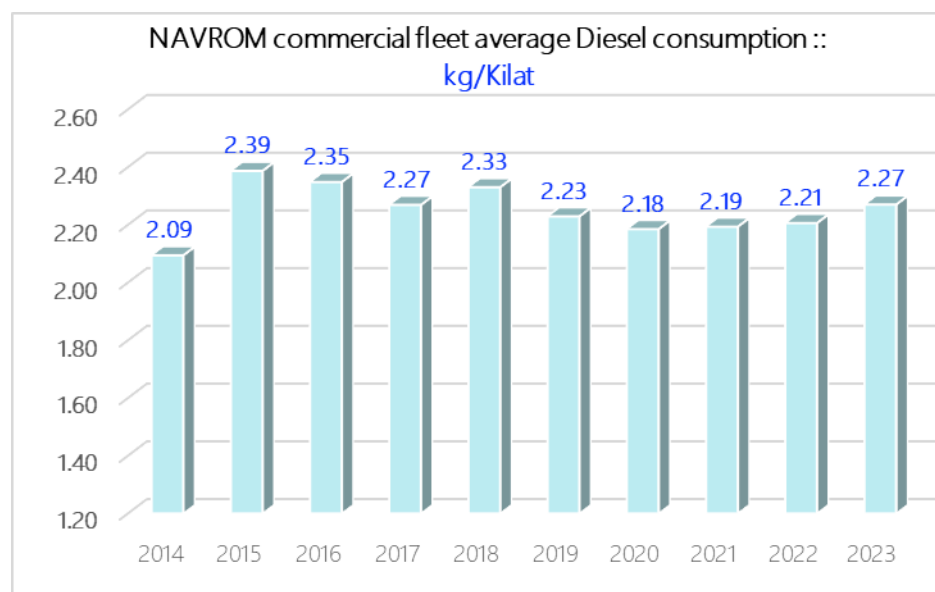


Diesel Consumption [tons]	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Pushers	16.550,6	17.985,6	16.270,3	17.714,5	16.528,4	19.419,5	17.039,6	17.598,9	14.745,7	14.120,2
Line and maneuvering ships	3.477,9	4.448,9	3.350,3	2.553,3	2.594,1	2.146,2	1.884,0	1.661,3	1.444,6	1.327,9
Commercial fleet consumption	20.028,4	22.434,6	19.620,6	20.267,8	19.122,5	21.565,7	18.923,6	19.260,2	16.190,3	15.448,1
Other ships	1.322,2	1.512,7	1.259,4	1.345,2	1.326,6	850,5	957,2	868,4	887,3	672,1
Total NAVROM fleet consumption	21.350,7	23.947,2	20.880,0	21.612,9	20.449,1	22.416,2	19.880,8	20.128,6	17.077,6	16.120,2

Average diesel consumption of commercial fleet ⁱ

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Diesel Consumption Commercial Fleet [tons]	20.028,4	22.434,6	19.620,6	20.267,8	19.122,5	21.565,7	18.923,6	19.260,2	16.190,3	15.448,1
Physical Distance Covered [thousand]	3.612.942	4.038.411	3.597.869	3.844.273	3.626.731	4.533.089	4.228.998	4.189.425	3.176.092	2.940.496

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
tons*km]										
Work Done [kilați]	9.563.635	9.399.623	8.356.059	8.932.878	8.206.762	9.675.075	8.661.075	8.781.509	7.339.391	6.814.555
[kg/1.000 tons*km]	5,54	5,56	5,45	5,27	5,27	4,76	4,47	4,60	5,10	5,25
Average Diesel Consumption [kg/kilat]	2,09	2,39	2,35	2,27	2,33	2,23	2,18	2,19	2,21	2,27



Total equivalent energy consumption of NAVROM fleet

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total diesel consumption NAVROM fleet [tons]	21.350,68	23.947,22	20.879,97	21.612,93	20.449,09	22.416,24	19.880,77	20.128,56	17.077,57	16.120,24
Calorific value of diesel [MJ/kg] ¹	42,6366	42,6366	42,6366	43,228	43,228	40,686	40,586	43,228	42,467	43,235

¹ Source for calorific value: National Environmental Protection Agency (<http://www.anpm.ro/documents/12220/37839994/Lista+valori+nationale+ FE PCN 2021.pdf/59376d4e-b993-4966-b03f-e0ddf4bfe380>)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total equivalent energy consumption fleet [TJ]	910,32	1.021,03	890,25	934,28	883,97	912,03	806,88	870,12	725,23	696,96

4. CO₂ emissions NAVROM fleet

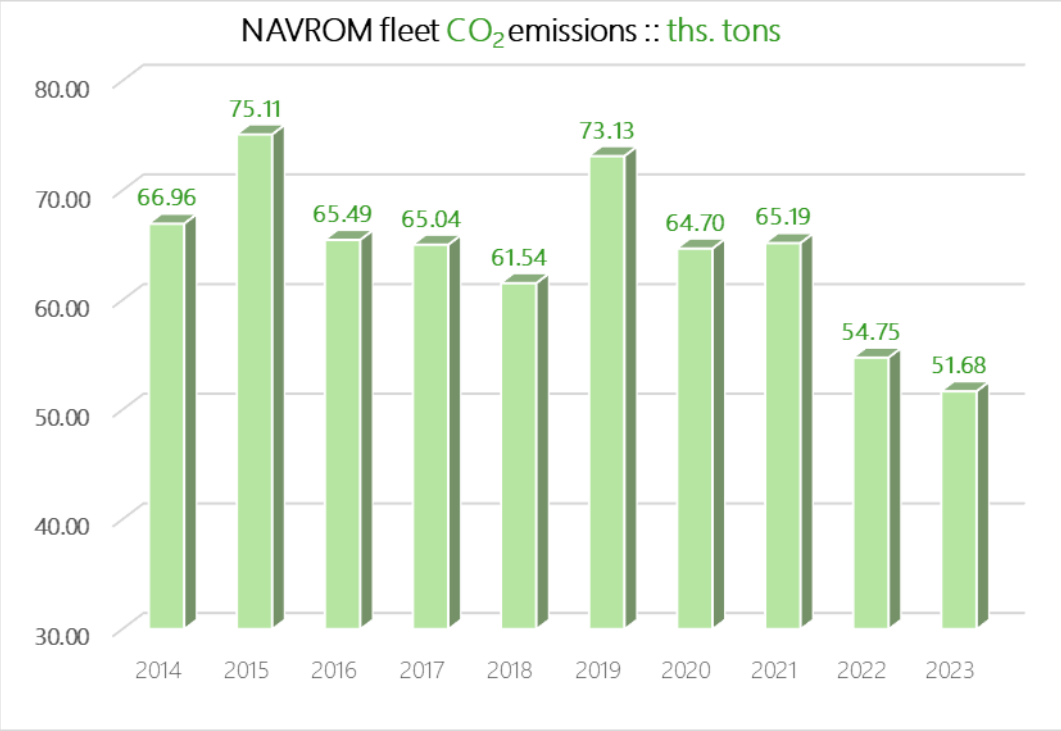
CO₂ emissions and CO₂ emission intensity for the commercial fleet

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Fuel consumption for the commercial fleet [tons]	20.028,4	22.434,6	19.620,6	20.267,8	19.122,5	21.565,7	18.923,6	19.260,2	16.190,3	15.448,1
Emission factor [tons CO ₂ / tons diesel] ²	3,1363	3,1363	3,1363	3,0095	3,0095	3,2622	3,2542	3,2389	3,2060	3,2060
CO₂ emissions [tons]	62.815,2	70.361,5	61.536,0	60.995,9	57.549,2	70.351,6	61.581,2	62.381,9	51.906,1	49.526,7
Physical distance traveled by goods [thousand tons*km]	3.612.942	4.038.411	3.597.869	3.844.273	3.626.731	4.533.089	4.228.998	4.189.425	3.176.092	2.940.496
Work done [kilaṭi]	9.563.635	9.399.623	8.356.059	8.932.878	8.206.762	9.675.075	8.661.075	8.781.509	7.339.391	6.814.555
[kg/1.000 tons*km]	17,39	17,42	17,10	15,87	15,87	15,52	14,56	14,89	16,34	16,84
CO₂ emission intensity [kg/kilaṭi]	6,57	7,49	7,36	6,83	7,01	7,27	7,11	7,10	7,07	7,27

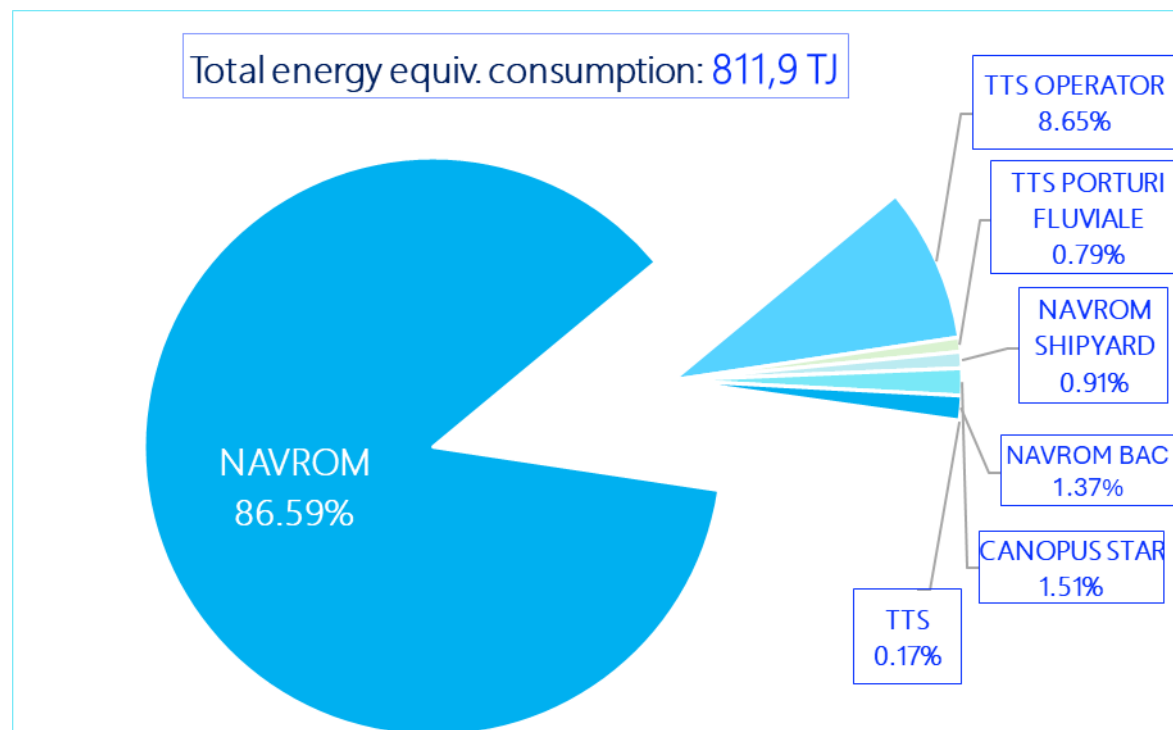
Total CO₂ emissions for the NAVROM fleet

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Fuel consumption NAVROM fleet [tons]	21.350,68	23.947,22	20.879,97	21.612,93	20.449,09	22.416,24	19.880,77	20.128,56	17.077,57	16.120,2
Emission factor [tone CO ₂ / tons diesel]	3,1363	3,1363	3,1363	3,0095	3,0095	3,2622	3,2542	3,2389	3,2060	3,2060
CO₂ emissions [tons]	66.962,1	75.105,7	65.485,8	65.044,1	61.541,5	73.126,3	64.696,0	65.194,4	54.750,7	51.681,4

² Source for the CO₂ emission factor for fleet diesel: European Commission - Directorate-General for Climate Policy (DG CLIMA) (https://climate.ec.europa.eu/document/download/5ef8c575-fce8-4b18-99b9-f301b7476c91_en?filename=02_guidance_monitoring_reporting_parameters_en.pdf)



5. Energy consumption within the monitoring perimeter - 2023



	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	NAVROM Bac	TOTAL
Diesel [tone]	5,02	16.160,5	1.606,6	28,83	35,58	18,75	226,2	18.081,5
Calorific value of diesel ³ : 43.235 GJ/ton								
Equivalent energy consumption [TJ]	0,216	698,7	69,46	1,25	1,54	0,811	9,78	781,8
Gasoline [tone]	6,93	5,05	4,54	3,28	0,54	0,00	1,28	21,62
Calorific value of gasoline: 43.510 GJ/ton								

³ The source for calorific values for diesel, gasoline, and natural gas is the National Environmental Protection Agency (http://www.anpm.ro/documents/12220/37839994/Lista+valori+nationale+_FE_PCN_2021.pdf/59376d4e-b993-4966-b03f-e0ddf4bfe380)

	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	NAVROM Bac	TOTAL
Equivalent energy consumption [TJ]	0,302	0,220	0,198	0,143	0,024	0,000	0,056	0,941
Natural gas [thousand m ³]	14,03	19,71	0,00	52,27	52,82	48,27	2,30	189,4
Calorific value of natural gas: 36,48 MJ/m ³								
Equivalent energy consumption [TJ]	0,512	0,719	0,000	1,91	1,93	1,76	0,084	6,91
Electric energy [MWh]	91,97	921,7	164,8	871,7	1.084,3	2.693,3	342,4	6.170,2
Electric energy conversion factor: 3,6 MJ/kWh								
Equivalent energy consumption [TJ]	0,331	3,32	0,593	3,14	3,90	9,70	1,23	22,21
TOTAL Energy Consumption [TJ]	1,36	703,0	70,25	6,44	7,39	12,27	11,15	811,9

6. CO₂ Emissions within the Monitoring Perimeter - 2023

Direct CO₂ emissions – Scope 1 GHG

	TTS	Navrom ⁴	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	NAVROM Bac	TOTAL
Diesel consumption [tons]	5,02	16.160,5	1.606,6	28,83	35,58	18,75	226,2	18.081,5
Emission factors: 3,2060 tons CO ₂ / ton of diesel for fleet; 3,0096 tons CO ₂ / ton of diesel for other mobile sources ⁵								
CO ₂ emissions from diesel [tons]	15,09	51.802,6	4.835,2	86,76	107,1	56,43	680,9	57.584,1
Gasoline consumption [tons]	6,93	5,05	4,54	3,28	0,54	0,00	1,28	21,62
Emission factor: 3,1162 tons CO ₂ / ton gasoline								
CO ₂ emissions from gasoline [tons]	21,60	15,75	14,15	10,21	1,69	0,00	3,99	67,38
Natural gas consumption [thousand m ³]	14,03	19,71	0,00	52,27	52,82	48,27	2,30	189,4
Natural gas emission factor: 55,48 tons CO ₂ / TJ								
CO ₂ emissions from natural gas	26,92	37,81	0,00	100,27	101,3	92,60	4,40	363,3

⁴ The consumption of diesel by NAVROM includes 16,120.2 tons consumed by the fleet and 40,236 tons consumed by other mobile sources.

⁵ Source for CO₂ emission factors for diesel consumed by other mobile sources, petrol, and natural gas: National Environmental Protection Agency (http://www.anpm.ro/documents/12220/37839994/List+valori+nationale+_FE_PCN_2021.pdf/59376d4e-b993-4966-b03f-e0ddf4bfe380)

[tons]								
Total direct CO ₂ emissions	63,62	51.856,1	4.849,4	197,2	210,1	149,0	689,3	58.014,8
[tons]								

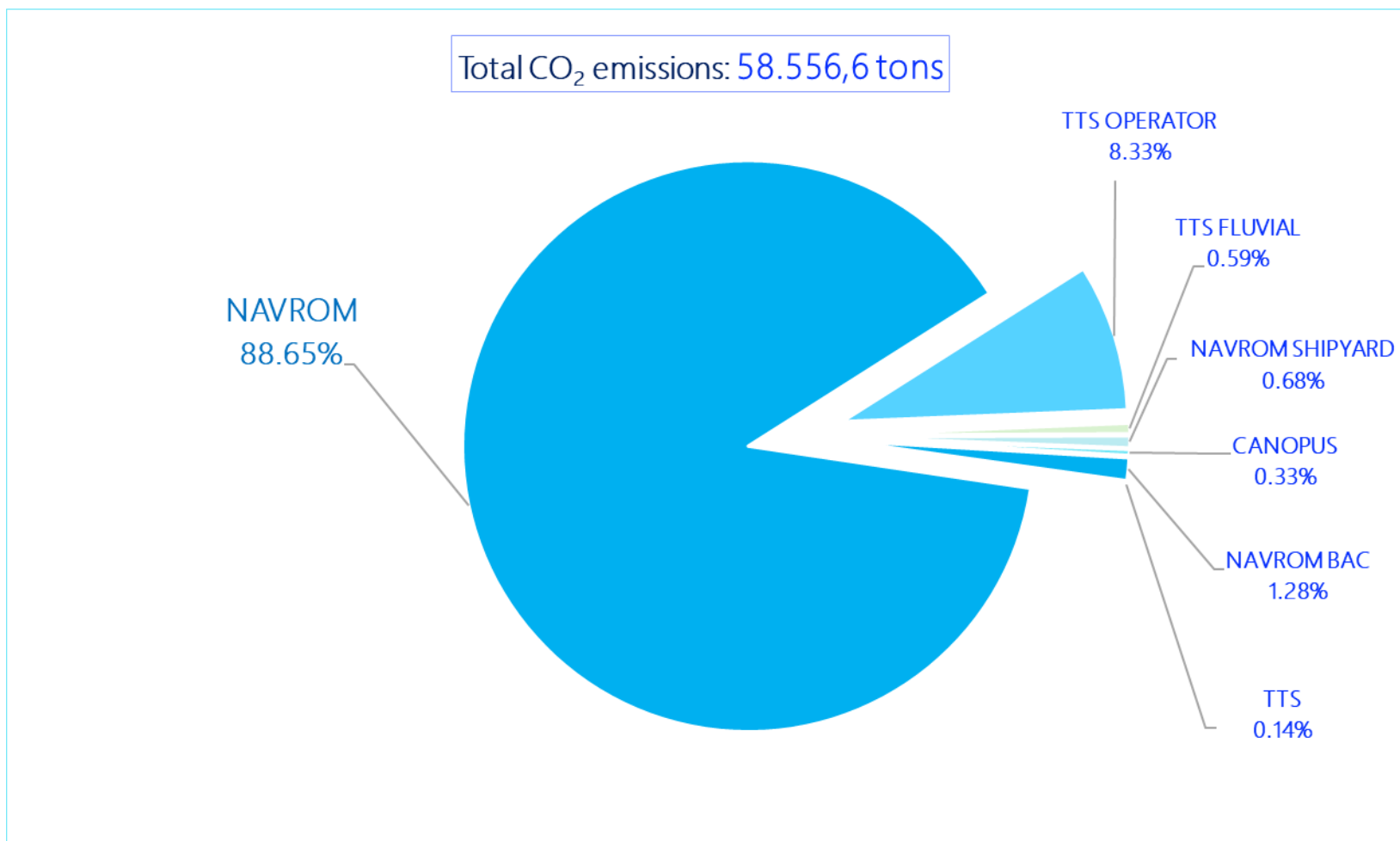
Indirect CO₂ emissions – Scope 2 GHG

	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	NAVROM Bac	TOTAL
Electricity consumption [MWh]	91,97	321,7	164,8	871,7	1.084,3	269,3	342,4	3.146,2
Emission factor for electricity ⁶ : 172,21 g CO ₂ / kWh								
Total indirect CO ₂ emissions	15,84	55,41	28,38	150,1	186,7	46,38	58,97	541,8
[tons]								

⁶ Source for the CO₂ emission factor for electricity: National Energy Regulatory Authority (https://anre.ro/wp-content/uploads/2024/04/Monitdec23_cu-eticheta.pdf)

Total CO₂ emissions

	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	NAVROM Bac	TOTAL
Total CO ₂ emissions [tons]	79,46	51.911,5	4.877,8	347,4	396,8	195,4	748,2	58.556,6



7. Waste management

Canopus

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Household waste	20.03.01	mc	300,52	300,52	IRIDEX Grup Salubrizare SRL
Biodegradable waste	20.02.01	mc	1674	1674	IRIDEX Grup Salubrizare SRL
Paper and cardboard	20.01.01	kg	9	13	Greentech Servicii Ecologice SRL
Paper and cardboard packing	15.01.01	kg	30	30	
Plastic material packaging	15.01.02	kg	32	32	
Plastic material	20.01.39	kg	65	40	
Scrapped equipment	16.02.14	kg	8	8	
Printers cartridges	08.03.17*	kg	10	10	
Iron waste	15.01.04	t	1,04	1,04	
Wood waste	15.01.03	t	5,309	5,309	PF Criciu Dumitru PF Preda Gheorghe PF Carmen Gheorghe

TTS Fluvial

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Household waste	20 03 01	mc	130,902	130,902	ECO SA, SP Ecosal, Rosal Grup/United Waste Solutions, IRIDEX Group Salubrizare, Brantner Servicii Ecologice, APDM Galați
Food waste	20 01 08	mc	2,640	2,640	APDM Galați
Paper and cardboard packing	15 01 01	to	2,424	2,424	SP Ecosal, ECO SA, Bca Vio Service
Plastic material packaging	15 01 02	to	0,640	0,640	
Paper and cardboard	200101	to	0,050	0,050	First Recycler
Electrical and electronic waste	160214	to	0,192	0,192	S.C. SPORTING IMPEX SRL
Electrical and electronic waste	200136	to	0,050	0,050	FIRST RECYCLER
Used oils	130205*	to	0,020	0,020	FIRST RECYCLER
Oil stained rags	150202*	to	0,100	0,100	C.N.APDM S.A. GL
Scrapped vehicle	160104*	to	3,400	3,400	REMATHOLDING CO SRL
Printers cartridges	080318	to	0,014	0,014	S.C. SPORTING IMPEX SRL
Crude oil waste	160708*	to	3,000	3,000	SETCAR SA
Bilge water	130405*	mc	3,100	3,100	C.N.APDM S.A. GL
Metallic waste	170405	to	8,740	8,740	SIMISIONU SRL
Printer toner waste containing hazardous substances	080317*	to	0,002	0,002	FIRST RECYCLER
Fluorescent tubes	200121*	to	0,015	0,015	FIRST RECYCLER

TTS Operator

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Used vaseline	13 08 99	TONS	1,52	1,52	GREENTECH SERVICII ECOLOGICE
Contaminated materials	15 02 02	TONS	0,17	0,17	GREENTECH SERVICII ECOLOGICE
Diesel, oil filters	16 01 07	TONS	0,41	0,41	GREENTECH SERVICII ECOLOGICE
Used oils	13 02 05	TONS	0,87	0,87	GREENTECH SERVICII ECOLOGICE
Baterries waste	16 06 01	TONS	0,5	0,5	CARANDA BATERII; MBC AUTO; MONDO TEHNICUS
Household waste	20 03 01	TONS	35,678	35,678	IRIDEX
Paper and cardboard	20 01 01	TONS	0,2	0,2	GREENTECH SERVICII ECOLOGICE
Bilge oils	13 04 03	TONS	0,3	0,3	CN APM SA
Printers cartridges	08 03 17	TONS	0,006	0,006	GREENTECH SERVICII ECOLOGICE
Scrapped electrical and electronic waste	16 02 14	TONS	0,08	0,08	GREENTECH SERVICII ECOLOGICE
Scrapped electrical and electronic waste - monitors	16 02 13	TONS	0,01	0,01	GREENTECH SERVICII ECOLOGICE
Contaminated packaging	15 01 10	TONS	0,235	0,235	GREENTECH SERVICII ECOLOGICE
Uncontaminated materials	15 02 03	TONS	0,9	0,9	GREENTECH SERVICII ECOLOGICE

Navrom

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Used oil	13.02.05*	to	61,494	61,494	A.P.D.M. S.A. Galați, A.P.M. Constanța, A.P.D.F. Giurgiu (port Giurgiu, port Dr Tr. Severin), Port Bratislava, Port Budapesta, Eco Total Craiova, S.C. BestNic Marine S.R.L. Constanța – punct de lucru Cernavodă
Bilge Water	13.04.01	To	237,504	237,504	A.P.D.M. S.A. Galați, A.P.M. Constanța, A.P.D.F. Giurgiu (port Giurgiu, port Dr Tr. Severin), Port Bratislava, Port Budapesta, APM Constanta
Oil filters	16.01.07*	to	2,930	2,930	A.P.D.M. S.A. Galați, Sara Transport S.R.L., , APDF Giurgiu (port Călărași, port Severin, Port Budapesta, Eco Total Craiova
Scrap	16.04.05	to	11,704	11,704	S.C. EcoMetalRecycling S.R.L., Remat Holding CO

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Used batteries	16.06.01	to	5,400	5,400	ZETAS BATROM IMPEX
Paper and cardboard	20.01.01	to	4,881	4,881	A.P.D.M. Galați, ECOSAL Galați, Sara Transport S.R.L. , EcoMetalRecycling S.R.L., Bratner Servicii Ecologice
Plastics	20.01.39	to	0,073	0,073	A.P.D.F. Giurgiu, Sara Transport, Brantner Servicii Ecologice, Ecosal Galați
Mixed municipal waste	20.03.01	to	133,447	133,447	ECOSAL Galați, A.P.D.M. S.A. Galați , JT Grup SRL , A.P.D.F. Giurgiu (port Cernavodă, port Giurgiu), Port Bratislava, Salport, Bratner Servicii Ecologice
EEE	16.02.14	to	3,218	3,218	EcoMetalRecycling S.R.L., Vastum Eco Trend
Packaging that contains residues or is contaminated with substances	15.01.10*	to	0,134	0,134	Sara Transport, Eco Total
Oil-soaked cloths	15.02.02*	to	0,910	0,910	A.P.D.M. S.A. Galați, A.P.D.F. Giurgiu, Port Bratislava Port Budapesta, A.P.D.F. Giurgiu (port Severin), Eco Total
Printers cartridges	08.03.18	to	0,028	0,028	Sara Transport SRL
Wood waste	20.01.38	to	2,920	2,920	ECOSAL Galați, Eco Metal Recycling,
Cardboard packaging	15.01.01	to	0,257	0,257	Sara Transport, Ecosal Galați
Hazardous EEE	16.02.11	to	0,200	0,200	Vastum Eco Trend
Textile waste	15.02.03	to	0,516	0,516	Sara Transport
Edible oils and fats	20.01.25	to	0,350	0,350	Puco Proverde IMD S.R.L.,
Used air filters	15.02.03	to	0,060	0,060	EcoMetalRecycling S.R.L.,
Fluorescent tubes	20.01.21*	to	0,130	0,130	Asociația RECOLAMP

Navrom Shipyard

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Paper and cardboard packing	15.01.01	to	1.355	1.355	U.P.G.C CERNAVODA Ecosal Gospodarie comunala GL
Plastics packaging	15.01.02	to	0.733	0.733	U.P.G.C CERNAVODA Ecosal Gospodarie comunala GL
Packaging that contains residues or is contaminated with substances	15.01.10*	to	0.93	0.93	SARA TRANSPORT SRL
Mixed municipal waste	20.03.01	to	22.32	22.32	U.P.G.C CERNAVODA Ecosal Gospodarie comunala GL
Bilge oil	13.04.01*	to	4.33	4.33	SARA TRANSPORT SRL APDM Depol
Iron and steel	17.04.05	to	149.22	149.22	MSD COM BUZAU Eco-Metal GL

Iron filings and span	12.01.01	to	6.78	6.78	MSD COM BUZAU Eco-Metal GL
Textile waste (absorbents, filter materials)	15.02.02*	to	0.995	0.995	SARA TRANSPORT Eco-Metal GL
PLstic and rubber materials	19.12.04	to	0.7	0.7	SARA TRANSPORT Eco-Metal GL
Sawdust	03.01.05	to	0.6	0.6	SARA TRANSPORT
Printers cartridges	08.03.17*	to	0.02	0.02	SARA TRANSPORT
Materials that are not suitable for consumption	02.03.04	to	32	32	SARA TRANSPORT
Absorbent waste, protective equipment	15.02.03	to	0.55	0.55	SARA TRANSPORT Eco-Metal GL
Cables	17.04.11	to	0.55	0.55	MSD COM BUZAU
Sandblasting materials	12.01.17	to	21.88	21.88	MSD COM BUZAU
Nonferrous span	12.01.03	to	0.492	0.492	MSD COM BUZAU Eco-Metal GL
Iron waste	16 01 16	to	581,36	581,36	Eco-Metal
Insulating material	17 06 04	to	0,15	0,15	Eco-Metal
Vaseline	12 01 12*	to	0,03	0,03	Eco-Metal
Contaminated metal packaging	15 01 10*	to	0,45	0,45	Eco-Metal
EEE	20 01 35*	buc	3	3	INGRADI
EEE	20 01 36	buc	142	142	INGRADI
Copper cable	17 04 01	to	0,09	0,09	Eco-Metal
Aluminum	17 04 02	to	0,03	0,03	Eco-Metal
Used tires	16 01 03	to	1,56	1,56	Eco-Metal
Expired paint	08 01 11*	kg	805,7	805,7	Eco-Metal

TTS

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Paper	20.01.01	to	0,1	0,1	Vrancart S.A.
Paper and cardboard packaging	15.01.01	to	1,1125	1,1125	Supercom S.A.
Plastics packaging	15.01.02	to	0,825	0,825	Supercom S.A.

Mixed municipal waste	20.03.01	to	9,3625	9,3625	Supercom S.A.
Fluorescent tubes	20.01.21*	to	0,0025	0,0025	Asociația Ateliere Fără Frontiere
Electric and electronic equipment waste	20.01.36	to	0,1307	0,1307	Asociația Ateliere Fără Frontiere

Navrom Bac

Waste	Waste Code	UM	Generated quantity	Recycled amount	Authorized Companies
Used oil	13.05.06*	tons	1,375	0,992	C.N. APDM S.A.
Used filters	16.01.07*	tons	0,327	0,265	C.N. APDM S.A.
Mixed municipal waste	20.03.01	tons	214,338	214,338	S.P. ECOSAL S.A. JT GROUP S.R.L.
Bilge water	13.0401*	tons	19,000	19,000	C.N. APDM S.A.
Used batteries	16.06.01	tons	0,760	0,760	S.C. DORU SI MIRCEA
Scrap	16.01.17	tons	6.65	6.65	S.C. ECO-METAL RECYCLING S.R.L.
Paper/cardboard	15.01.01	tons	4,976	4,976	S.P. ECOSAL S.A.
Cloth	15.02.02*	tons	0,100	0,100	C.N. APDM S.A.
Plastic waste	15.01.02	tons	0,018	0,018	S.P. ECOSAL S.A.

8. Working conditions

8.1. Work relations

Company	Number of employees	Trade union organization	Colective labor contract	Collective bargaining
TTS	44	No	No	Yes
Navrom	720	No	No	Yes
Canopus	10	No	No	Yes
TTS Fluvial	130	No	No	Yes
TTS Operator	240	No	No.328/11.10.2022	Yes
Navrom Bac	94	No	No. 200/10.11.2023	Yes
NAVROM Shipyard	254	Reparații navale Navrom Galați	14665/27.02.2022 14665/29.09.2022	Yes

In companies where trade unions have not been set up, the task of resolving employee notifications and complaints rests with the management of the companies.

All concluded employment contracts provide the following rights for employees:

- 8h working day and 48h⁷ working week with the legal exceptions in accordance with the provisions ILO Hours of Work (Industry) Convention, 1919 (No.1) and ILO Hours of Work (Commerce and Offices) Convention, 1930 (No. 30)
- Paid rest leave of at least 21 working days per year
- Paid medical leave

Notifications and complaints are received by fax, e-mail, post/courier service or directly at the company's headquarters, registered by the registry in the register of issued/received documents, and then directed to the person responsible for solving the reported problems.

Companies have a documented complaint management system procedure.

Annually, company managements analyze and order measures regarding the internal management system of employee notifications and complaints.

Some companies contract workers through personnel leasing service providers, according to the law. These companies ensure that the suppliers have a good reputation and that the contracted workers have access to the complaints resolution mechanism available to the company's employees .

8.2. Health and safety at work

Employee	TTS	NAVROM	TTS OPERATOR	TTS FLUVIAL	NAVROM SHIPYARD	NAVROM BAC	CANOPUS	TOTAL
Total working hours (hours)	77.283	1.416.788	404.704	254.865	592.339	190.943	16.244	2.953.166
No. fatal work accidents	0	0	0	1	0	0	0	1
No. non-fatal work accidents	0	7	0	0	2	0	0	9
No. work accidents	0	7	0	1	2	0	0	10
No. working days lost due to accidents	0	222	0	0	20	0	0	242
LTIR ⁸	0	0,988	0	0	0,670	0	0	0,610
Fatal accident incidence rate ⁹	0,0	0,0	0,0	0,785	0	0	0	0,068
TRIR ¹⁰	0,0	0,988	0,0	0,785	0,670	0	0	0,677

⁷ The provisions apply to full time employment contracts. Part-time contracts provide for working times less than 8h/day, 48h/week.

⁸ Incidence rate of non-fatal accidents [non-fatal accidents / 200,000 work hours]

⁹ [fatal accidents / 200.000 work hours]

¹⁰ Incidence rate of occupational accidents [occupational accidents/200,000 work hours]

Contractants	TTS	NAVROM	TTS OPERATOR ¹¹	TTS FLUVIAL	NAVROM SHIPYARD ¹²	CANOPUS	NAVROM BAC
Total working hours (hours)	0	0	110.715	0	1.752	0	0
No. fatal work accidents	0	0	0	0	0	0	0
No. non-fatal work accidents	0	0	0	0	0	0	0
No. work accidents	0	0	0	0	0	0	0
No. working days lost due to accidents	0	0	0	0	0	0	0
LTIR ¹³	0	0,0	0	0	0	0	0
Fatal accident incidence rate	0	0,0	0	0	0	0	0
TRIR ¹⁴	0	0,0	0	0	0	0	0

8.3. Occupational health and safety training

	TTS	Navrom	TTS Operator	TTS Fluvial	Canopus	NAVROM Shipyard	NAVROM BAC
<i>Annual OSH training program</i>	✓	<i>Training program no. A23-68/05.01.2023</i>	✓	✓	<i>The annual training program for employees in the field of OSH</i>	✓	✓
<i>OSH training plan</i>	✓	<i>Procedure PO 26: regarding staff training + Training topics by category</i>	<i>Periodic training planning IIG, ILM</i>	✓	✓	<i>OSH theme</i>	<i>OSH theme</i>
<i>Proof of training</i>	<i>Individual training sheets</i>	<i>Individual training sheets</i>	<i>Individual training sheets</i>	<i>Individual training sheets</i>	<i>Individual training sheets</i>	<i>Individual training sheets Training minutes for contractors</i>	<i>Individual training sheets</i>

¹¹ Supplier: TOP PRESTPORT COM SRL

¹² Suppliers: SEA PORT, PRIMA NAVAL

¹³ Incidence rate of non-fatal accidents [non-fatal accidents / 200,000 work hours]

¹⁴ Incidence rate of occupational accidents [occupational accidents/200,000 work hours]

8.4. Fire safety

Navrom

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	22.11.2023
	Semesterly for office buildings	23.11.2023
	During each duty shift on the ships	-
Inspection and certification of fire detection and suppression electrical and mechanical systems	Annual	9.11.2023
Portable fire extinguisher inspection, refilling/recharging	Annual ¹⁾	Apr. 2023 Mai 2023 Sep. 2023

¹⁾ – Inspections must be done annually. Being a large number of fire extinguishers, the activity was done in several stages

Fire extinguishing means are checked annually. Portable fire extinguishers are transported to the premises of specialized companies (usually the companies from which the fire extinguishers were purchased), where both cargoes and valves or other parts are replaced or checked. After verification, these companies issue quality/guarantee certificates for the extinguishers.

Canopus

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	18.05.2023/13:00 18.05.2023/19:20 19.05.2023/08:20 19.05.2023/19:20
Inspection for verifying and operate the alarm/warning and fire detection system at the administrative building and grain warehouses	It is done every six months - SC GLOBAL TECHNICAL SERVICES SRL (maintenance of the fire detection system at the administrative building and grain warehouses)	Check register 21.04.2023 02.08.2023 17.11.2023
Fire extinguisher verification inspection (due date)	It is done annually SC GROUP EUROVEST SRL	January/July/September 2023
Inspection and verification of electrical installations and	It is done every six	

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
their related earthings .	months - SC PET COMMUNICATION SRL	06.06.2023

NAVROM Shipyard

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	Annual chart
Inspection and certification of fire detection and suppression electrical and mechanical systems.	Annual	14.04.2023 * Office building fire system review
Portable fire extinguisher inspection, refilling/recharging	Annual	20.01.2023 11.05.2023 13.11.2023

TTS Operator

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	18.05.2023 18.05.2023 19.05.2023
Inspection and certification of fire detection and suppression electrical and mechanical systems. Portable fire extinguisher inspection, refilling/recharging	According to the OHS/PSI/Environment convention concluded between TTS and Canopus, the responsibility for checking the PSI equipments belongs entirely to the owner - Canopus	

TTS

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	Nr. 139/27.11.2023
Inspection and certification of fire detection and suppression electrical and mechanical systems.	Annual	Test report no. 21/25.06.2023

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Portable fire extinguisher inspection, refilling/recharging	Annual	Warranty Certificate no. 672/31.10.2023
Inspection for verification and operate the alarm/warning and fire detection system at the administrative building	It is done periodically by Inrotel Group SRL	TTS 2023 Register

TTS Fluvial

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	31.03.2023, 15.05.2023, 25.05.2023, 12.06.2023, 29.08.2023, 19.09.2023, 01.11.2023, 02.11.2023, 03.12.2023, 27.12.2023
Inspection and certification of fire detection and suppression electrical and mechanical systems..	-	-
Portable fire extinguisher inspection, refilling/recharging	Annual	4.01.2023, 08.03.2023, 08.03.2023, 10.05.2023, 15.06.2023, 5.07.2023, 12.07.2023, 31.07.2023, 11.08.2023, 22.08.2023, 12.09.2023, 18.09.2023, 12.10.2023, 03.11.2023

NAVROM BAC

<i>Fire safety verification activities</i>	<i>Mandatory frequency</i>	<i>Dates performed</i>
Fire Drills	Annual	21.05.2023
Inspection and certification of fire detection and suppression electrical and mechanical systems.		
Portable fire extinguisher inspection, refilling/recharging	Annual	12.06.2023

8.5. Work accidents

Navrom

Accident	Date	Description	Documents send to authorities	Documents received from authorities	Measures
I.T.M.	06.01.2023	Fracture of the right hand in the palm area	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed
I.T.M.	29.01.2023	Left hip fracture	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed
I.T.M.	06.03.2023	Sprained right leg in the ankle area	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed
I.T.M.	24.03.2023	Pelvic fracture	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed
I.T.M.	05.06.2023	Fracture of the fibula bone of the right leg	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed
I.T.M.	17.06.2023	Fractured ribs 8 and 9 right side	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed
I.T.M.	22.07.2023	Injured little finger on the right hand	Research file + FIAM	Notice addresses Research file + FIAM	Risk reassessment Update prevention and protection plan Case processed

Navrom Shipyard

Accident	Date	Description	Documents send to authorities	Documents received from authorities	Measures
ITM	15.11.2023	Falls from a height - lack of railing and safety belt	Research file to ITM and FIAM	ITM approved research file	Review of Risk Assessments and Prevention and Protection Plan
ITM	13.12.2023	Improper use of lifting equipment - hoist	Research file to ITM and FIAM	ITM approved research file	Review of Risk Assessments and Prevention and Protection Plan

TTS FLUVIAL

Accident	Date	Description	Documents send to authorities	Documents received from authorities	Measures
Fatal work accident	29.07.2023	Fell on the conveyor belt due to the use of an improvised crossing instead of using the walkway at the end of the belt.	<ul style="list-style-type: none"> - Documents requested by ITM Galati for event research - FIAM for approval and verification 	<ul style="list-style-type: none"> - Document requests and document clarifications - Minutes of the investigation of the event from 29.07.2023 - FIAM verified and registered 	<ul style="list-style-type: none"> - improvement of signaling at workplaces; - delimitation and fencing off of hazardous areas; - updating the internal regulations regarding the prohibition of alcohol consumption, introducing rules and measures for alcohol testing upon entry/exit from shifts and during the workday; - issuing an internal memo prohibiting the consumption of alcoholic beverages during working hours and reporting to work under the influence of alcohol; - revision of risk assessment and the prevention and protection plan; - processing investigation reports with all employees.

9. Environmental protection

9.1. Environmental permits and reporting obligations

TTS Fluvial

Bechet Workpoint

Environmental permit from Bechet issued by APM Dolj no. 98/14.06.2021; Decision no. 1868 of 05/09/2023 for application the visa for the period 06/14/2023-06/14/2024

Data that will be reported to the authority for environmental protection and periodicity:

- Waste statistics. Questionnaire 4: PRODDDES-completed by waste producers, annually, on request, SIM application access
- Questionnaire 4: PRODDDES-completed by waste producers
- Waste management reporting, annually, until March 31, the data corresponding to the previous year
- Air, soil analysis bulletin - at the request of the environmental authority;
- Other data required by APM Dolj and GNM-on request

Brăila Workpoint

Environmental permit issued by APM Brăila no. 44/26.03.2013 (last revision 05.03.2021); Decision no. 22/17.01.2024 for application the visa for the period 26.03.2024-25.03.2025

- Waste management reporting, annually, until March 31, for the previous year;

Drobeta Turnu Severin Workpoint

Environmental permit issued by APM Mehedinți no. 1/05.01.2021; Decision no. 297/09.11.2023 for application the visa for the period 05.01.2024-05.01.2025.

Data that will be reported to the authority for environmental protection and periodicity

- Emission limit values for noxes from the thermal power plant - annually;
- Statistical survey regarding waste management, questionnaire type GD - PRODDDES;
- Reporting centralized data on waste management - annually;
- Quantities of used oil: every six months;
- Other reports, requested by the CFM Office, if case

Oltenița Workpoint

Environmental permit from Port Oltenita issued by APM Calarasi no. 7/17.01.2024;

Data that will be reported to the authority for environmental protection and periodicity :

Every year, until March 15, the authorization holder will prepare and submit to A.P.M. Calarasi an annual environmental report (RAM), which will contain information about:

- Identification data of the owner of the activity;
- Monitoring according to point III.1;
- Reporting the waste generated by own activities according to H.G. no. 856/2002 Annex 1 and O.U.G. no. 92/2011 art. 48, paragraph 1- keeping a monthly chronological record, publish it in tabular format and make it available to A.P.M., until March 15 of the year:
 - a) The waste code according to art. 7 (1), the amount in tons, the nature and origin of the waste generated, as well as the amount of products and materials resulting from preparation for reuse, recycling or other operations of valorization/ disposal;
 - b) Destination, frequency of collection, mode of transport and treatment method for waste, when relevant; and
 - c) The amount of waste in tons for disposal.

- According to O.U.G. no. 195/2005, art. 28-The natural and legal persons who manage dangerous substances and preparations have the following obligations: to keep strict records-quantity, characteristics, means of securing dangerous substances and preparations, including their containers and packaging, which fall under their scope of activity and to provide the information and data required by the competent authorities according to the specific legislation in force;

- In case of accidental pollution, G.N.M.-C.J. Calarasi, A.P.M. Calarasi and S.G.A. Calarasi, will be notified within 2 hours with the source of the pollution, the type of the pollutant and the materials under doping are intervened for accidental pollution situations. In the case of finding that the thresholds are exceeded, the Intervention Plan will be followed ;

Giurgiu and Galați Workpoints

These activities do not require environmental authorization.

Canopus

ENVIRONMENTAL PERMIT No. 84/25.03.2020; DECISION NO. 214/01.02.2023 for application the visa for the period 25.03.2023-25.03.2024

Data that will be reported to the authority for environmental protection and periodicity:

- Annual reporting in the PRODES SIM application – waste management reporting for the previous year
- Annual waste management reporting to APM for the previous year until March 31, 2024
- Reporting to the Environmental Fund - monthly declaration for packaging related to imports
- Quarterly reporting to the APM and the Environmental Guard of the waste water bulletins and dust bulletins.

NAVROM Shipyard

Galați Workpoint

Environmental Permit No. 229/28.12.2022

- Noise level reporting at the limit of the functional areas, at the peak hour of the activities carried out - annually;

- Waste management reporting according to H.G. no. 856/2002 – quarterly;
- Management plan for organic solvents containing organic compounds - annually
- Reporting of freshly used oil and the generated used oil - every six months and at the request of A.P.M. Galati
- Statistical survey regarding waste management, questionnaire type GD - PRODDDES - annually and at the request of A.P.M. Galati
- Reporting of evidence of substances and chemical preparations used by types and quantities - annually, until January 31 for the previous year
- Immediate reporting of any event that could have an impact on environmental factors

Cernavodă workpoint

Environmental Permit no. 197/26.06.2013, revised in 09.10.2023

Water Management Permit no. 4/07.01.2022

- Reporting of total suspended powders and sedimentable powders - every six months;
- Centralizer of analysis bulletins of drained used water - annually
- Determination of noise level - at the request of APM Constanta
- Waste management reporting (H.G. NO. 856/2002), annually, until March 31, for the previous year;
- Reporting the quantities of chemical products used - annually

NAVROM

Drobeta Turnu Severin - Restaurant „Vraja Dunării”

Environmental Permit no. 125/14.09.2012, Revised on 14.10.2021

Water Management Permit no.109/12.09.2022

- Waste statistical reporting: GD PRODES - annually, until March 15, for the previous year
- Waste management reporting - annually, until March 15, for the previous year
- Reporting the quantities of dangerous chemical substances and preparations managed - annually, until January 31, for the previous year
- Waste water monitoring report - every six months to S.G.A. MEHEDINȚI
- Other reports at the request of the C.F.M. Office. from A.P.M. MEHEDINȚI

Drobeta Turnu Severin Workpoint - Passenger Port River km 937 ("Mehedinți" ship)

Environmental Permit no. 58/18.12.2015, Revised on 17.12.2020

- Waste management reporting (H.G. NO. 856/2002), annually, until March 31, for the previous year
- Waste statistical reporting: GD PRODES - annually, until March 31, for the previous year
- Water monitoring - annually

Constanța Branch

Environmental Permit no. 123/18.08.2022

- Presentation of analysis bulletins for Ph, suspended matter and biodegradable detergents - at the request of the environmental authority;
- Waste management reporting in written and electronic format, according to OUG no. 92/2021 - annually, until March 15, for the previous year
- Waste management reporting in S.I.M. - at the request of the environmental authority

-
- Presentation of noise level determination bulletins - at the request of the environmental authority
 - Reporting the amount of used oil, until April 30 of the year following the one for which it is reported
 - Presentation of analysis bulletins for waste water discharged into the municipal network - at the request of the environmental authority
 - Any accidental pollution will be reported immediately to the environmental authority

Galati Headquarters

- Waste management reporting in written and electronic format, according to OUG no. 92/2021 - annually, until March 31, for the previous year
- Reporting the management of fresh and used oil generated, in accordance with H.G. no. 235/2007 - quarterly and at the request of APM Galati (within the term mentioned in the request)
- Reporting of evidence of dangerous substances and preparations used - annually at APM Galati until January 31 of each year, for the previous year
- Immediate reporting to APM Galati and G.N.M. - C.J. Galati of any event that could have an impact on environmental factors
- Reporting any exceedances of the allowed limit values to the quality indicators of the pollutants allowed to be discharged into the environment
- Immediate reporting to APM Galati and GNM - CJ Galati in the event of an event (regardless of the affected environmental factor - water, air, soil) that can occur in ecological accidents/incidents, accidental pollution and the transmission of the Information Report in case of pollution accidental, according to the Annexes displayed on the website of APM Galati - information of public interest section, within 2 hours at the latest from the occurrence of the event
- Other data at the request of the environmental authority

9.2. Monitoring and Compliance

Company	Monitoring program	Waste reporting	Compliance (monitoring parameters)				Achievement
			Air	Ground	Noise	Water	
TTS - Bechet	Environmental permit no. 98/14.06.2021	ANNUAL	On request	On request	-	-	yes
TTS - Giurgiu	-	ANNUAL	-	-	-	-	yes
TTS - Oltenița	-	ANNUAL	-	-	-	-	yes
TTS Fluvial - Galați	-	ANNUAL	-	-	-	-	yes
TTS Fluvial - Brăila	Environmental permit no. 44/26.03.2013, rev 2021	ANNUAL	-	-	-	-	yes
TTS Fluvial – Tr. Severin	Environmental permit no.. 1/05.01.2021	ANNUAL	Verification report no. 11/20.01.2022	-	-	-	yes
Canopus	Environmental permit no.. 84/25.03.2020	MONTHLY	Dust bulletin no..100/31.03.2023 328/09.2023; 358/14.12.2023	-	-	Used water bulletin no.467/09.03.2023; 1334/14.06.2023; 2478/09.09.2023; 3208/10.12.2023	yes
TTS Operator	-	ANNUAL	-	-	-	-	yes
NAVROM Galati	Environmental permit . 173/29.10.2019	ANNUAL	-	-	-	-	yes
NAVROM Drobeta Tr. Severin Restaurant „Vraja Dunării”	Environmental permit. 125/14.09.2012 Rev. 2021	ANNUAL	-	-	-	Test report. 661/22.06.2023	yes
NAVROM Sucursala Constanța	Environmental permit 123/18.08.2022	ANNUAL	-	-	On request	On request	yes
NAVROM SHIPYARD -	Environmental	QUARTERLY	Report	-	Noise bulletin	-	yes

Company	Monitoring program	Waste reporting	Compliance (monitoring parameters)				Achievement
			Air	Ground	Noise	Water	
Galați	permit. 229/ 19.12.2012 REV. 2015		Nr.6848/01.03.2023		no..4999/17.07.2023		
NAVROM SHIPYARD - Cernavodă	Environmental permit no.197/ 26.06.2013, rev 09.10.2023	2 per Year	Test report -powders in suspension - sedimentabile powderr	-	On request	-	yes

Notes

ⁱ Regarding liquid fuel consumption, energy intensity and CO2 unit emissions, the EHS Report is focused on the NAVROM fleet, the largest consumer in the reporting area. For this reason, the report presents statistics starting from 2014, thus allowing the appreciation of NAVROM's evolution over a period of 10 years.

Fleet efficiency indicators are presented in two versions:

- Related to the physical distance traveled [thousand tons*km]
- Related to work performed [kilats]

The work done by a propelled ship is a quantity derived from the physical course which, in addition to the distances traveled and the quantities of cargo transported, takes into account the mass of the pusher and the barges, as well as the navigation conditions, like:

- direction of travel: upstream or downstream,
- the degree of difficulty of navigation on each stretch of water that the convoy crosses

For clarity, the statistics also include the values of the physical routes performed and the work performed by the NAVROM fleet in each of the monitored periods