

Managing our environmental impact

As an enabler of global trade, we work closely with our clients to lead and facilitate positive environmental change in shipping. As a business, we are committed to monitoring and minimising our carbon footprint in the nearer term and achieving net zero by 2050 in line with current UK government targets.



The pressure on all industries to decarbonise continues to increase as a result of both regulatory interventions and wider societal expectations. This is reflected in the shipping industry, which accounts for 2.3% of global CO₂ emissions, and at Clarksons we are conscious of the important role that we play. The Board has reflected on Clarksons' position as a largely office-based intermediary which has been committed to minimising its scope 1 and 2 emissions over recent years, and the global nature of its business in which overseas travel is essential for maintaining client relationships. As a result, the Board recognises that opportunities to significantly reduce our own emissions further, whilst growing the business, are limited. Our belief is that the most significant impact we can have on global CO₂ emissions is through our role in supporting our clients in meeting their own climate-related goals, which are driven by IMO and EU regulations in particular (see pages 16 and 17), alongside their own aspirations.

Our purpose as a Company is to 'enable smarter, cleaner global trade' and to 'lead positive change', which is aligned with our strategy, in particular our strategic pillars of Breadth, Reach, Understanding, People and Trust (read more on pages 44 and 45). In line with our purpose and strategy, the Board has set an objective to work alongside our clients to minimise emissions from the shipping industry by:

- Raising awareness and understanding amongst our clients of changes in IMO and EU regulation.
- Providing our clients with the data and tools necessary to make decarbonisation decisions.
- Helping clients to meet their climate-related goals by working with them to identify solutions.

The Board assesses whether this objective has been met through a number of metrics, which include:

- Developments in our Research division to broaden the intelligence available to clients.
- Investment in divisional teams to better support our clients in their decarbonisation strategies.
- Evolving our technology offering to provide clients with the tools to inform cleaner decisions.
- The way in which we are working with other stakeholders in our shipping community to further support the shipping industry's role in meeting global decarbonisation.

The Board noted the progress set out on the next page against these metrics in 2022.

Metric	Update
Developments in our Research division to broaden the intelligence available to clients.	 Following its launch in 2021, further development of Renewables Intelligence Network, which provides leading data on offshore renewables generally, including the fast-growing offshore wind market, with good client adoption and strong client feedback. Development of the Clarksons Research energy transition model, which supports our clients in planning for the coming decades around changes in the energy mix. Continued focus on building significant data streams on every vessel type, supporting clients in selecting the most environmentally friendly ships. Enhanced provision of data on alternative-fuelled ships.
Investment in divisional teams to better support our clients in their decarbonisation strategies.	 Continued training of our people so that they can raise awareness and understanding amongst clients of changing IMO and EU regulations around decarbonisation. Further development, expansion and integration of the Green Transition team, launched in 2021. Creation of a carbon capture presence within both the Green Transition and gas teams. Investment in the car carrier team, which works with clients to meet the needs of Electric Vehicle manufacturers and their customers to deliver sustainably produced and transported vehicles. Enhancement of expertise within the newbuilding team to support clients in their decisions regarding alternative-fuelled vessels, thereby evolving the tonnage on the water towards lower-emitting vessels. Significant amount of business won by the Support division to support offshore wind farms. Focused the Gibb Safety and Survival business in the Support division on meeting the needs of the industry which supports the construction and maintenance of offshore wind farms. Significant deal-flow within the Securities business across renewable and clean technology.
Evolving our technology offering to provide clients with the tools to inform cleaner decisions.	 Acquisition by the Maritech business of Chinsay AB, a software provider which enables companies to create, share and manage their dry cargo charterparties (see pages 56 and 57 for more information), and Setapp, a technology provider to the maritime sector. Scaling the Sea/ business throughout 2022 to enhance products, including Sea/carbon, our carbon accounting tool that helps clients to provide insights on emissions when planning and executing journeys. Continued work by the Financial division with banks and shipowners to meet
other stakeholders in the shipping community to further support its role in meeting global decarbonisation.	 Continued work by the Financial division with banks and shipowhers to meet the needs of the Poseidon Principles. Further input into the evolution of frameworks and initiatives promoted by bodies such as Sea Cargo Charter, the Getting to Zero Coalition and Green Ship of the Future.

As mentioned on the previous page, we are also conscious of our own carbon footprint as a business. Whilst we view this as immaterial by comparison with the impact that we can have on the wider shipping industry, actions that we have already taken over the last few years to minimise our scope 1 and 2 emissions are set out below. We will continue to take actions that will minimise our footprint further where available.

- Roll-out of LED lighting, which has already been implemented in a number of offices, and continues to be progressed across our largest office in London.
- Incorporation of sustainable considerations at the forefront of the design of a purpose-built office and warehouse facility in Great Yarmouth for our port services business.

- Increased use of technology to enable virtual meetings, thereby reducing emissions associated with travel.
- Changes to monitor power settings to put monitors to sleep more quickly and save energy.
- Purchase of a commercial standard cardboard and paper shredder for our port services business to convert used boxes into packing material for items we distribute.
- Launch of an Electric Vehicle scheme for UK employees, alongside cycle-to-work schemes.
- Recycling of food waste to make fertiliser and to generate gas for electricity production.
- Minimising the use of plastic in staff canteens by removing plastic cutlery and using recycled materials for takeaway products.
- Through the Employee Voice Forum, raising awareness of and inviting employee input into energy-saving measures to be implemented.

Read more:

- Our greenhouse gas emissions on pages 60 and 61.
- TCFD on pages 62 and 63.
- The regulatory timeline on pages 16 and 17.

Strategic Report

Corporate Governance

2022 environmental performance summary

Following the easing of COVID-19 pandemic restrictions and the return to business-as-usual across the globe, Clarksons' total greenhouse gas ('GHG') emissions have increased since 2021, but remain significantly lower than pre-COVID-19 levels. Overall, on a location basis, our emissions are 5,840 tCO₂e, which is an increase of 97% on 2021 and a 38% decrease from 2019. Calculated on a market basis, our emissions are 5,807 tCO₂e. With regards to our carbon emissions intensity, we averaged 3.3 tCO₂e per employee (1.2 tCO₂e per employee for scope 1 and scope 2 emissions only) in 2022.

Our carbon footprint

Despite the reopening of most offices during the year, our scope 1 and 2 emissions have decreased since 2021. This has been driven largely by a 5% decrease in electricity consumption globally. This decrease, combined with the ongoing decarbonisation of electricity grids in several locations in which we operate, has resulted in a 9% reduction in location-based electricity emissions. In scope 1, lower emissions have been driven by a decrease in company car usage, as well as very few refrigerant top-ups being recorded during the year. While reductions were observed across scope 1 and 2, the limited scope 3 emissions we currently monitor increased significantly, driven almost entirely by a resumption in business travel as COVID-19 restrictions lifted.

Our energy efficiency initiatives

We recognise that our operations have an environmental impact, and we are committed to monitoring and minimising our emissions year on year. In the period covered by this report, the Company has undertaken the following emissions and energy reduction initiatives:

- Applying changes to monitor settings to put monitors to sleep more quickly and save energy.
- Switching off office digital screens overnight when they will not be in use.
- Minimising the use of plastic in staff canteens through removing plastic cutlery.
- Upgrading recycling signage in bin areas to encourage the separation of waste and improve recycling rates.



In addition, a number of local initiatives which were implemented previously remain in place. These include cycle-to-work schemes, an Electric Vehicle scheme and recycling of food waste.

Outlook

We are committed to monitoring and minimising our carbon footprint in the nearer term and achieving net zero by 2050 in line with current UK government targets. We will consider the actions to be taken in this regard and provide an update in the 2023 Annual Report.

Methodology

We are reporting our GHG emissions and associated energy use as required by the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018 (the '2018 Regulations') for our global operations.

We have reported the emission sources for which we have operational control for our global estate for the reporting period 1 January 2022 to 31 December 2022.

Our GHG emissions were calculated in accordance with the requirements of the WRI 'GHG Protocol Corporate Standard (revised version)' and Defra's 'Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance' (March 2019). We have applied the appropriate GHG conversion factors from the UK Department for Business, Energy & Industrial Strategy ('BEIS') and International Energy Agency¹.

We have included in scope all the properties where we are directly responsible for the consumption of energy, including our tenanted offices. Our carbon footprint for the 2022 reporting year was calculated from activity data for scope 1 emission sources and electricity consumption in scope 2. This disclosure builds on the minimum requirements for compliance with the 2018 Regulations to include additional material scope 3 emissions from business travel and office operations (waste, water, paper). Our emissions are presented on both a location and market basis. Location-based reporting applies a country-specific factor to electricity consumption whilst market-based reporting takes account of the specific electricity tariff/supplier used.

Whilst we have endeavoured to obtain accurate and complete data wherever possible, where there were data gaps, we have used reasonable estimations such as annualisation of actual data, use of expenditure data as a proxy and typical office consumption benchmarks.

1 This work is partially based on the country-specific CO₂ emission factors developed by the International Energy Agency, © OECD/ IEA 2022, but the resulting work has been prepared by Clarksons and Avieco and does not necessarily reflect the views of the International Energy Agency.



Clarksons' GHG emissions (tCO₂e) and associated energy consumption (MWh) for 2022

	UK 2020 (tCO ₂ e)	Global (excluding UK) 2020 (tCO ₂ e)	UK 2021 (tCO ₂ e)	Global (excluding UK) 2021 (tCO ₂ e)	UK 2022 (tCO ₂ e)	Global (excluding UK) 2022 (tCO ₂ e)	% change in total emissions (vs 2021)
Scope 1	588	206	759	234	766	157	-7
Natural gas	174	44	237	66	236	66	0
Other fuels	222	-	193	40	240	19	11
Company cars	100	159	155	74	125	72	-14
Fleet	47	-	133	-	161	-	21
Refrigerants	45	3	41	54	3	-	-96
Scope 2 location-based (electricity)	900	574	815	544	687	553	-9
Scope 3 ¹	171	904	183	479	460	3,217	455
Total Scope 1 + 2 (location-based)	1,488	780	1,574	778	1,453	709	-8
Total Scope 1 + 2 + 3 (location-based)	1,659	1,684	1,757	1,257	1,913	3,926	94
Total Scope 1 + 2 + 3 (market-based) ²	2,042	1,847	1,741	1,211	1,890	3,917	97
Total Energy Usage (MWh)	6,382	2,656	7,140	2,637	7,180	2,556	0
Total global (including UK) Scope 1 + 2 emissions/FTE		1.4		1.4		1.2	-12
Total global (including UK) emissions/FTE		2.1		1.8		3.3	85

Scope 3 emissions from business travel and office operations (waste, water, paper).
 Location-based factors have been applied where there are no residual mix factors available.

Task Force on Climate-Related Financial Disclosures ('TCFD')

The Company has reported consistent with the TCFD recommendations during the year ended 31 December 2022, with the exception of the recommendation regarding targets under the Metrics and Targets pillar where we have provided an explanation.

Our approach to the governance and risk management pillars of TCFD is integrated into our wider processes, and our reporting in relation to these areas is therefore set out within the relevant sections of the Annual Report.

Governance

Describe the board's oversight of climate-related risks and opportunities

The Board has overall responsibility and accountability for all risks and opportunities, including all climaterelated matters. The Audit and Risk Committee monitors the impact of climate change on our principal risks, including their materiality, as part of their ongoing monitoring of actual and emerging business risks. **Describe management's role in assessing and managing climate-related risks and opportunities** Our CFO & COO takes overall executive responsibility for ESG matters (including climate change). Our CEO and the Executive Team lead the identification of climate-related opportunities as part of their responsibility for delivering the strategy and identify and manage climate-related risks within their relevant areas.

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Read more:	Read more:
Our governance framework on pages 92 and 93.	Our governance framework on pages 92 and 93.

Strategy

Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term, and their impact on the organisation's business, strategy, and financial planning

The risks and opportunities for our business are identified through existing business planning and risk management processes. In 2022, we revisited previously identified risks and opportunities and were satisfied that there were no new emerging risks to be considered. Further detail on the review undertaken and the risks and opportunities identified through the review are set out on the next page. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario In 2021, we undertook climate scenario analysis to understand how the climate-related risks and opportunities that we face may manifest themselves under two different temperature pathways (including one aligned to the Paris Agreement). We are satisfied that this remains relevant.

Read more:
 Climate scenario analysis on page 63.

Read more: Climate scenario analysis on page 63.

Risk Management

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Describe the organisation's processes for identifying, assessing and managing climate-related risks and how those processes are integrated into the organisation's overall risk management

Our processes for identifying, assessing and managing the impact of climate change on our principal risks are integrated into our existing risk management processes.

Read more: Our risk management framework on pages 75 and 76.

Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process

The metrics used by the Board to assess our climate-related opportunities are set out on page 59. The principal climate-related risk that we have identified relates to stakeholder environmental expectations, which the Board assesses through stakeholder feedback.

Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas emissions, and the related risks

Our scope 1, 2 and limited scope 3 emissions are disclosed on page 61. During the year, we evaluated other scope 3 categories and selected purchased goods and services and capital goods as the most relevant categories for Clarksons. Work to measure emissions within these categories in our largest locations commenced in 2022. In light of the implementation of a new finance system, further work is required to enhance the robustness of that data, which remains an area of focus. We will provide a further update in the 2023 Annual Report.

Our environmental performance on pages 58 to 61.

Read more: Our impact on pages 58 and 59.

Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets

We have confirmed our commitment to achieving net zero by 2050 in line with current UK government targets. We will consider the actions to be taken in this regard and provide an update in the 2023 Annual Report.

Evaluating climate risks and opportunities

The risks and opportunities relating to climate change for our business are identified through existing business planning and risk management processes, As set out on page 73 of the 2021 Annual Report, in 2021 we conducted a thorough analysis of transition and physical risks and opportunities that could affect the shipping industry. As a result, one risk and two opportunities were assessed in terms of likelihood and impact, in line with our risk management framework, from a long-term perspective, in accordance with internally developed maritime-specific climate scenarios:

- **The Gradual Transition scenario** tracks to a moderate overshoot of the Paris Agreement 2°C temperature increase by 2100. In this scenario, CO₂ emissions peak in the late 2020s and then gradually decline through a gradual shift away from fossil fuel use and robust growth in solar, wind and other renewable energy sources, alongside some developments in carbon capture.
- **The Rapid Decarbonisation scenario** is compatible with the goals of the Paris Agreement, and requires steep global annual emissions reductions, sustained for decades, to stay within a 1.5–2°C temperature increase. This scenario is characterised by a rapid decline in fossil fuel use, albeit with gas playing a role as a transition fuel, and an exponential growth of renewable energy production, developments in carbon capture and land use changes.

In 2022 we revisited the risks and opportunities relating to climate change for our business, and were satisfied that there were no new emerging risks which needed to be factored into our assessment. Focusing therefore on the one risk and two opportunities identified in 2021, we were satisfied that the climate scenario analysis that was described on pages 74 and 75 of the 2021 Annual Report remains relevant and that there have not been any new developments that need to be factored in to this analysis.



Read more:

Focusing on our people and our communities

Our people

We believe that everything centres around our excellent people. They are at the heart of the business and drive the products and services we provide, and the way we engage with our clients. Our people remain the biggest differentiating factor for us, and the diverse range of backgrounds, nationalities, skills and experience within our global teams is representative of the international markets we operate in. This, together with our commitment to continually develop and empower our people and support them in a role and environment where they can thrive and perform at their best, underpins our culture. Our people strive to deliver our strategic pillars, embody our cultural values and act in accordance with our behaviours every day.

COVID-19

During 2022, the impact of COVID-19 largely retreated as we returned to a normal way of working and doing business in most of our global locations, with some exceptions. As we were able to return to office locations and meet with clients and other stakeholders, we have benefited enormously from the return to in-person engagement and collaboration. However, the lessons learnt during the pandemic remain in focus and the well-being of our people and their families will remain at the centre of our thinking.

Health and well-being

This year we have invested more to further support the well-being of our people, with the addition of resources that provide digital therapy, health, and well-being support for our global workforce in addition to our comprehensive packages of other benefits.

It is a signature of our culture for our managers to be closely engaged with their teams. We have enjoyed the huge personal, social and business-related benefits of being back together in the office.

Engagement

We are a relationship business and the partnerships that we build and maintain with our employees, clients and communities are integral to our success. This comes from engaging meaningfully with them.

The management style of our organisation is to engage directly and personally with our people, and our management structures and hierarchies support this. Every line manager maintains open lines of communication with their teams, and this remains the most effective way of ensuring consistent engagement in both directions.

Other specific and targeted forms of engagement with employees comes from:

- Global executive and divisional management forums that meet monthly.
- Employee pulse surveys for certain divisions.

- The Employee Voice Forum with Non-Executive Directors, which is attended by employees from various divisions across the business and provides for and encourages two-way communication between our employees and Non-Executive Directors. The forum is chaired by Heike Truol, our Employee Engagement Director. Discussions over the last year have centred on key topics impacting the industry such as digital transformation and the green transition and the impact this has on our employees, the ESG agenda and the experience of our entry-level talent.
- Increased use of our internal communications channel (Voyage) which is updated with news from our 56 offices; education on topics of interest to the industry; information regarding the evolution of products and services provided by the Group; and 'Focus on' and 'Clarksons meet' content to get to know global colleagues.
- Regular communications from senior management updating employees on key matters, and in particular video updates from our CEO and CFO & COO presenting publicly released financial results and updates on the work of the CSR Committee.
- We have brought our people together for team, office or leadership events and offsites which has been a huge boost to morale and reinforced the personal nature of the environment in which we operate.
- Monthly CSR Committee meetings attended by a cross-section of employee Committee members and visiting attendees focusing on the charitable causes that are important to our global community.

We also recognise the benefits of encouraging employee engagement through share ownership. Further detail on the participation of our employees in share plans can be found on page 98.

Talent management, promotion, recognition and reward

We have continued to invest in developing and retaining the best talent in our markets. Our key objective and focus is to ensure that our people become our future leaders. We create an environment in which our people have a broad experience; collaborate across our business; and participate in the running of their respective business divisions to gain exposure to leadership responsibilities. We achieve this by:

- Global executive and divisional management forums that meet monthly.
- Managing a global promotions process that is conducted bi-annually based on consistent assessment criteria, levelling the playing field.





- Leveraging our competency and behaviours framework, which we use to attract, retain, develop and promote our people based on consistent criteria, and which is designed to be transparent about expectations.
- A bespoke management and leadership development programme which will be undertaken by managers and leaders.
- Regular sessions with Maritime Masters in which they present and lead seminars.
- Widening the scope of our development programmes to help employees at all stages of their career take control of their personal development, support retention of our early- and mid-level management and facilitate succession planning.

The attraction and development of early careers talent remains a priority for our business as we seek to increasingly diversify our workforce and prepare to meet the needs of the continually evolving global markets in which we operate.

Recruitment

We remain focused on attracting, engaging and retaining the best talent. Our in-house recruitment model is evolving with direct search capabilities which enable us to hire the best talent and access more diverse recruitment pools. The model enables a consistent candidate experience, whilst leveraging our employer brand. Our new employer brand represents our broad expertise and market specialisms that are underpinned by data and enabled by technology, allowing us to access talent interested in driving the continued disruptive change in our industry. We are evolving our recruitment channels for greater access to, and engagement with, a diverse and broad spectrum of both active and passive talent, and we are building talent pipelines for future hiring needs. We are developing our recruitment platform to meet the demands of a competitive talent marketplace and we continue to monitor our inclusive recruitment practices on an ongoing basis. We partner with organisations that share our values and support our goals.

Learning and development

Our learning and development strategy focuses on the development of our people's capabilities, skills and competencies to remain dedicated to excellence and the trusted advisor of choice to our clients.

We achieve this through a blended model that prioritises professional development via close mentoring, exposure to challenging work assignments and projects, and a flat structure that provides our people with access to world-leading expertise, all underpinned by appropriate education and training.

We have developed a bespoke management and leadership development programme that will deliver learning in a way that reflects the realities of leading within our business. It delivers content that has greatest impact for leaders operating in a fast-paced industry and creates an environment in which targeted leadership skills and behaviours can be acquired, practised and perfected in our live workplace setting.

Our growing commitment to learning is reinforced with work on the development of the Clarksons Academy – a centralised global portal supporting induction, technical and industry training, personal and professional development and providing global access to online learning programmes with a leading provider, Goodhabitz. This enables all our staff to access a broad range of courses to support ongoing personal and professional development.

In 2022, we launched a fresh approach to performance management, with an emphasis on delivery of the Group's strategic goals as cascaded down through the business lines, and behavioural assessment against the Clarksons Behaviour Framework (as included on page 2).

Our learning and development strategy is also closely aligned with our increasing efforts to recruit new talent into the Group. This is demonstrated by our continuing support for Maritime UK's Maritime Masters programme.

We continue to support employees wishing to study for membership of the Institute of Chartered Shipbrokers or any other relevant professional qualification.

Diversity and inclusion

We have committed to a progressive and strategic diversity and inclusion approach that comprehensively targets all aspects of the organisation. We strive to ensure that we use a diversity and inclusion lens at every opportunity. We are honest with ourselves about our current context and some of the challenges we face in our industry.

To help us on this change journey, we are partnering with a strategic diversity and inclusion specialist focusing initially on quantitative data as the bedrock of a strategy to understand the requirements for meaningful change. This will be augmented with qualitative data collection and analysis to support an evidence-based strategy for our short-term, mid-term, and long-term inclusion goals. We are continually reviewing our approach, including constant review of our global recruitment processes; the terms and conditions we have in place with the recruitment agencies that we use; the way we hire and engage with potential candidates across the various locations and jurisdictions in which we operate; the language we use in our role vacancies and posts, and our internal policies and materials; and marketing that we use to interact with potential talent. We are seeing the change in practice from the successful implementation of our direct sourcing model and capabilities to reach a much broader pool of candidates and improve our brand outside the traditional network in which we are known. Our newly developed management and leadership development programme has a key focus on diversity and inclusion. We continue to work on transparency and creating a level playing field in our people processes, and seeking to ensure performance management and promotion processes are aligned to our strategy, values and behavioural framework.

We are confident that this practical approach will deliver more tangible outcomes for the business and our diversity and inclusion objectives, and ensure we are constantly striving to improve.

Health and safety

It is vital to look after the health, safety and well-being of our people. Our objective is to provide a safe and secure workplace for all. Our policies and procedures are designed to minimise the risk of injury and ill health of our workforce as well as other people attending our premises.

The Board has approved the Group Health and Safety Framework and has appointed the CFO & COO as sponsor for health and safety. The CFO & COO chairs the Group Health and Safety Committee, which is responsible for monitoring compliance of the framework and reporting to the Board. The Board receives updates on health and safety matters, covering any areas of concern and key updates from operational committees.



Each site is responsible for managing its own health and safety in line with the Group Health and Safety Framework and in compliance with local laws and regulations. With the exception of some higher-risk activities within our Support division, such as port agency and freight forwarding, all locations conduct office-based activities only and are therefore considered relatively low risk. Health and safety in the UK is managed by two committees that report to the Group Health and Safety Committee – a committee dedicated to the highest-risk activities in the Support division and a further committee focused on UK office activities.

Communities

Industry partners

Throughout 2022, we partnered with a number of maritime associations which are paving the way for the future of the maritime industry.

This was demonstrated by our continuing support for Maritime UK's Maritime Masters programme. We ran a series of webinars for postgraduate students studying for Master's qualifications at nine leading UK universities and business schools, culminating in the hosting of a virtual finalists reception in October. These webinars proved to be very popular and will be provided again in support of the 2023 Maritime Masters programme.

Our ongoing involvement with this event supports the significant role we play in encouraging and developing young talent in shipping, and this year we wanted to support students further by increasing their connectivity to the industry. We hosted a webinar series geared specifically to aid students' learning and understanding of the challenges and trends currently faced in maritime. The series culminated in a recruitment masterclass which will help the students to take proactive steps in improving their employability within a competitive marketplace.

Clarksons Research provides over 50 maritime university and research programmes across the world with access to research and data, helping important academic research and supporting the learnings of our clients and colleagues of the future. Many of these relationships are long-standing, involve both undergraduate and postgraduate research and extend to universities based in key maritime centres around the world, including Asia, Europe and the Americas. We also provide data and intelligence to inter-governmental organisations, governments, regulators and various industry and trade bodies, helping frame debate and policy decisions around the development of the shipping industry, including climate change and safety at sea.

Charitable donations

We are committed to giving back to society through our corporate social responsibility programme. Our aim is to bring about positive social change and have a lasting impact on people and communities. Activities within our corporate social responsibility programme are overseen by our CSR Committee. In 2022, we supported a number of charities which included initiatives for mental and physical health, education, homelessness and maritime-related causes. One of the great charities we supported was Mission to Seafarers, which helps care for seafarers around the world with the provision of practical and emotional support.

We also proudly participated in Mercy Ships Cargo Day in November 2022, with brokers across our offices forgoing 50% of their commission, resulting in a contribution of over US\$195,000 to Mercy Ships, a development organisation that deploys hospital ships to some of the poorest countries in the world, delivering vital, free healthcare to people in desperate need.

We encourage individual employee fundraising efforts globally, and during the year we supported various initiatives raised by our people, including the rebuilding of homes destroyed in the Bangladesh floods. A Payroll Giving scheme is available in the UK for employees to make regular, tax-free donations from their gross pay.

During the year, 200 employees across the Group took part in our Survival of the Fittest challenge as part of Charity Giving Day 2022, in a bid to win the fitness challenge and to also raise funds for The Clarkson Foundation. Funds were also raised on the day by a gala dinner and auction in London, and the Group provided matched funding for amounts raised by employees, resulting in over £250,000 being donated to The Clarkson Foundation.

As well as fundraising, we encourage our employees to volunteer their time and skills. The Aberdeen office, comprising the offshore and port services teams, supported AberNecessities (a baby bank for disadvantaged families) throughout the year with funds from bake sales and volunteering. This included helping to sort through donated items, pack and deliver Christmas Eve boxes so that 'No Child Should Go Without', as well as assisting the charity with their cardboard waste disposal.

We continued our participation in the Growth Project, a collaborative project between business leaders and their equivalent charity leaders. This year-long scheme is designed to help both sides understand their role as leaders in their respective organisations. It combines training and close mentoring in monthly meet-ups. Three leaders joined the scheme from Clarksons and were paired with 'Global Girl Project', which supports the mobilisation of socially minded and community-driven girls around the world; the 'Sam and Bella Sebba Charitable Foundation', a grant-making body which seeks to promote a more humane society by supporting vulnerable people and protecting their rights; and 'FAST London', a community youth charity in South London. Once again, the project has been very successful, with all Clarksons participants finding the experience impactful from both a personal and a professional perspective.

In total, Clarksons CSR initiatives led to over £850,000 being donated towards charitable causes in 2022.



Welcome to The Clarkson Foundation Making a tangible difference.

Operating as an independent registered charity, The Clarkson Foundation is managed by a Board of Trustees comprised of Clarksons employees from across the business, utilising their skills to make a positive impact on society.

Board of Trustees	Business area
Jeff Woyda (Chair)	CFO & COO
Leo Askaroff	Sale and purchase
Lily Bagshaw	Events
Alex Gray	Futures
Richard Haines	Dry cargo
Bob Knight	Tankers
Dharani Sridharan	Finance
Kate Thompson	HR
Tilly Harvey (Secretary)	Company Secretariat

Funds are raised for the charity by donations from Clarkson PLC and through a broad range of activities such as the annual Charity Giving Day, which sees Clarksons employees take part in various fundraising activities.

Since its formation in 2020, The Clarkson Foundation has provided grants to fund a variety of charitable projects in the UK and overseas. Clarksons employees are encouraged to put forward charities meaningful to them for consideration. The Trustees select initiatives to support by focusing on projects which can achieve the biggest impact and demonstrate operational efficiency. The charities supported during the year tackle issues including physical and mental health, poverty, homelessness and disaster relief. In 2022, over £250,000 was donated to support various charities, some of which are set out to the right.

Dig Deep

Dig Deep was provided a grant to fund the building of safe toilets, clean water facilities and hygiene education in five schools in Bomet, Kenya. The project was so successful that a further grant was provided to fund nine community spring protection projects in 2023, which will have an estimated 9,000 direct beneficiaries over the next five years, improving health, livelihoods and female empowerment.

Renaissance Foundation

A grant was provided to the Renaissance Foundation to fund equipment for its new Hub in Aldgate, London. The Hub will be the charity's permanent home – providing a safe, welcoming and consistent space for young patients and young carers to thrive.

Global Girl Project

A donation was made to the Global Girl Project to help with the delivery of its leadership programme for girls. The Global Girl Project mobilises women around the globe for social change through community development and social action.

Frontline 19

A grant was provided to Frontline 19 to support its free, confidential therapy service to the UK's National Health Service and frontline workers to ensure those who need help can access support quickly and easily.

Disaster Emergency Committee ('DEC')

A grant was made to support the DEC's appeal for Ukraine, to help DEC charities deliver food, warmth, clean water and medical care to people in Ukraine and vital support to refugees in neighbouring countries.

The Wave Project

The Wave Project delivers 'surf therapy' in the UK to young people at risk of mental ill-health to improve their emotional and physical well-being. In 2021, a grant was awarded to fund a new minibus for The Wave Project's Northern Ireland location on the Causeway Coast. In 2022, a further grant was provided to fund a minibus for the Isle of Wight which helps over 60 children each year.

The Whitechapel Mission

Having supported the charity over Christmas in 2021, The Whitechapel Mission in London was provided a further grant for the provision of 450 hot meals during the 2022 Christmas period for those experiencing homelessness. In addition, a donation was made to support the 'Choc & Socks' scheme, to provide a small gift and hygiene kit to people using the centre.

The Trussell Trust

A grant was made to support the work of The Trussell Trust. The charity supports a nationwide network of food banks in the UK and provides emergency food and support to people locked in poverty.

For more information www.theclarksonfoundation.com



Supporting inspirational causes













Maintaining robust governance

How we do business

We are committed to conducting our business in an ethical, honest and professional manner wherever we operate and to:

- Act fairly, honestly and with integrity at all times and in everything we do, and to comply with all applicable laws.
 Treat our employees, clients, contractors, suppliers
- and other stakeholders fairly and with respect.
- Create a high-quality, equal opportunity working environment for all our employees, based on merit and free from discrimination, bullying and harassment.
- Respect human rights.

Compliance at Clarksons

To enshrine our commitment to act ethically, we have a Compliance Code which sets out the expectations and standards we place on ourselves and our staff. Following our code is mandatory and all employees, officers and Board members are required to read, understand and commit to our Compliance Code annually.

The Compliance Code contains a suite of robust and proportionate policies and procedures that mitigate ethics and compliance risks such as sanctions breaches, bribery and corruption, money laundering, insider dealing, market abuse and conflicts of interest.

Annual mandatory online training modules are completed each year by all relevant employees, officers and Board members to raise and reinforce awareness in these and other areas, particularly for those exposed to greater risk of ethical or legal breaches.



Our global compliance support team help embed the policies and procedures across our offices and divisions. A clear and accessible whistleblower policy exists to enable reporting of misconduct in confidence (and anonymously) to an independent external provider without fear of reprisal. Whistleblowing reports arising from its operation are overseen by the Board in line with the UK Corporate Governance Code. Where required, local mandatory whistleblowing policies also exist.

Sound financial and due diligence controls are in place which help reduce the risk of inter alia money laundering, sanctions breaches and bribery and corruption. These include transparent accounting records; risk-based due diligence on all staff, clients and third parties; external audit and an outsourced internal audit function; and an effective Audit and Risk Committee.

A clear tone from the top enhances our culture of integrity and supports an ethical and compliant stance.

In addition, our regulated businesses are subject to further compliance requirements which are set out in their specific compliance codes and implemented through specific procedures.

Anti-bribery and corruption ('ABC')

In line with overall compliance processes, the Group has a robust ABC compliance programme consisting of:

- A formal ABC policy highlighting our zero tolerance of bribery and corruption which is communicated to and applies to all employees and third parties undertaking business for or on behalf of the Group.
- An external Group ABC policy statement available on our website to communicate the Group's ethical position.
- ABC online and bespoke training for all employees to raise and reinforce awareness, particularly with those open to greater risk of bribery and corruption.
- Risk-based due diligence, carried out on clients, contractors, suppliers and employees before contracting with them and periodically thereafter.
- A sound system of financial controls which helps reduce the risk of bribery and corruption, such as separation of duties and delegated authority levels, transparent accounting records and a requirement for full supporting documentation for all transactions.
- A comprehensive set of policies which address possible bribery and corruption risks, for example conflicts of interest, expenses and gifts and hospitality policies.
- Our whistleblower policy to permit reporting of misconduct to an external provider without fear of reprisal.
- External audit and an outsourced internal audit function, whose effectiveness is evaluated annually.
- An effective Audit and Risk Committee, which oversees our compliance programme.

Human rights

We believe that the respect of human rights is integral to being a responsible company and we are committed to treating individuals with respect and dignity.

Clarksons places value on difference and believes that diversity of people, skills and abilities is a strength that helps us to achieve our best. Any discrimination based on race, religion, nationality, gender, age, marital status, disability, sexual orientation or political affiliation is prohibited within the business.

We have a Supplier Charter in which we ask our suppliers, amongst other things, to commit to respecting human rights, diversity, inclusion and the environment.

We are committed to providing a workplace free of any form of harassment or discrimination and expect our suppliers to do the same. Read more about our approach to diversity and inclusion on pages 65, 66, 106 and 107.

Sanctions

Our commitment over the last five years to building a global KYC/due diligence team and investing in our sanctions technical and personnel capabilities meant that we have been well placed to manage the volume of sanctions enquiries and consequent Know Your Customer ('KYC') analysis following the unprecedented number of sanctions enacted in 2022 directed at Russia from the EU, US, EEA, UK, Singapore, Australia and the G7. The sanctions have included the designation of thousands of Russian individuals and Russian companies, wide-ranging export and import bans as well as financial sanctions.

Sanctions in 2022

In early 2022, the UK and EU prohibited UK and EU persons from brokering the sale or charter of vessels to 'Russian persons'. EU and UK shipbrokers must now perform additional due diligence to ensure that prospective buyers and charterers of a vessel are not Russian Persons. Russian Persons are defined not just as entities located in Russia or incorporated under the laws of Russia, which is relatively easy to establish, but also as entities 'domiciled in Russia'. It can be challenging to ascertain whether an entity is domiciled in Russia. It requires EU/UK shipbrokers to assess where a company has its 'central administration' or 'principal place of business'. We are uniquely placed to be able to do this level of due diligence partly due to the size and expertise of our KYC team and access to third-party and proprietary databases, but also due to our global reach, local knowledge and ability to investigate on the ground.

Modern slavery

Slavery, servitude, forced labour and human trafficking ('modern slavery') is a global and growing issue, and no sector or industry can be considered immune. We are committed to ensuring that there are no forms of modern slavery within our operations or supply chains.

Our supply chain comprises worldwide suppliers providing a wide range of support functions and products including catering, maintenance, information technology, cleaning and security. In our material supplier contracts in the UK, we request that our suppliers commit to ensuring that their supply chain complies with legislation with regard to modern slavery.



Our General Terms and Conditions also include client obligations to comply with modern slavery legislation.

Our procurement procedures seek to ensure that our suppliers, contractors and service providers act ethically and with integrity, and have in place effective systems and controls so that modern slavery is not taking place within their own businesses. Our Supplier Charter asks our suppliers to commit to respecting human rights, diversity, inclusion and the environment. Suppliers which do not meet the standards we expect are not engaged to provide goods or services.

We remain committed to building and strengthening our existing policies and practices to eliminate modern slavery and human rights violations in our supply chain. We therefore continue to review the effectiveness of our current arrangements and, where necessary, implement additional safeguards and procedures.

In line with the Modern Slavery Act 2015, we publish an annual Modern Slavery and Human Trafficking Statement on our website.

Suppliers

Whilst we do not consider suppliers to be a significant stakeholder in our business, we are committed to treating our suppliers fairly. You can read more about how the Board takes account of suppliers in its decision-making on page 54.

Non-financial information statement

The table below constitutes the Company's non-financial information statement, in compliance with sections 414CA and 414CB of the Companies Act 2006.

Reporting requirement	Key policies and standards, and more information				
Environmental matters	D Read more: Environment on pages 58 to 63.				
Our employees	Global Staff Handbook Global Diversity and Inclusion Policy Compliance Code Global Privacy Statement and Policy Health and Safety Policy Statement Whistleblowing Policy				
	Read more: Our people on pages 64 to 67. How we do business on pages 70 and 71.				
Social matters	CSR Committee				
	D Read more: Communities on page 67.				
Human rights	Ethics Policy Statement Modern Slavery and Human Trafficking Statement Global Privacy Statement and Policy				
	Read more: Our people on pages 64 to 67. How we do business on pages 70 and 71.				
Anti-corruption and anti-bribery	Anti-Bribery and Corruption Policy				
	Read more: How we do business on pages 70 and 71.				
Business model	D Read more: Our business model on pages 46 to 51.				
Principal risks	Read more: Risk management on pages 77 to 81.				
Non-financial key performance indicators	Read more: Key performance indicators on pages 14 and 15.				