

MPC Container Ships ASA: Corporate Social Responsibility

Last amended and adopted by the Board of
Directors on February 26, 2024

In order to achieve the company's objectives, it is essential that MPC Container Ships ASA ("**MPCC**" or the "**Company**") is trusted by society. As a corporation, we must be able to efficiently manage the challenges and requirements society imposes on our activities.

MPCC is engaged in the worldwide marine transportation of containerized goods. The business activity of the Company is to invest in maritime assets (vessels, shares in ship-owning companies, loans secured by vessels, and/or shares in ship-owning companies) with a particular focus on small- to mid-size container vessels, chartering out the vessels per time charter agreements, operate and sell them as well as working out the acquired maritime loans in order to take over the securing assets.

At the date of this report MPCC owns through its subsidiaries 59 container vessels. Crewing and commercial- and technical ship management services for these vessels are sub-contracted to third party ship and/or crew managers, while MPCC remains responsible for the performance of these services. Sub-contractor performance is actively monitored and overseen by MPCC, in particular budget compliance and the technical maintenance of each vessel.

This report constitutes the Company's reporting according to the requirements of the Norwegian Accounting Act § 3-3c on social responsibility reporting.

Corporate responsibility and our principles

As a globally active shipping company, MPCC considers the creation of shareholder and stakeholder value as the core purpose of our business activities. The Company believes that the ability to create long-term sustainable value lies in linking economic and financial advancements with environmental, social and governance propositions and thus following the principles of Corporate Social Responsibility.

Corporate Social Responsibility shall be reflected in our core values, in the quality of our work and services, and in our entire range of activities. There must be coherence between what we say and what we do. MPCC shall:

- operate our business with integrity and respect laws, different cultures and human dignity;
- show consideration for the local communities in which we are a part of, the environment in which we operate, and emphasize spin-off effects of the Company's activities;
- contribute to learning and distribution of knowledge;
- establish long-term working relationships and utilize the shipping sector's expertise for the
- further development of the industry;
- meet public authorities and customers with insight, respect and understanding and in an open and appropriate manner and treat suppliers impartially and justly;
- adopt a long-term perspective in our business strategy and decision making, that is taking economic and ecological aspects equally into account; and

- reduce our negative and increase our positive impact on our ecologic footprint and in consequence contribute to the preservation of the environment in which we operate.

Ethics

The Company adheres to a Code of Conduct ([link](#)) which requires our employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees must practice fair dealing, honesty, and integrity in every aspect in dealing with other employees, business relations and customers, the public, the business community, shareholders, suppliers, competitors, and government authorities.

When acting on behalf of MPCC, employees shall not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair dealing practices.

The Company's Code of Conduct prohibits unlawful discrimination against our employees, shareholders, directors, customers, and suppliers on account of ethnic or national origin, age, sex or religion. Respect for the individual is the cornerstone of the Company's policy. All persons shall be treated with dignity and respect, and they shall not be unreasonably interfered with in the conduct of their duties and responsibilities.

No employee should be misguided by loyalty to MPCC or desire for the Company's profitability to disobey any applicable law or the Company's policy.

Environmental impact

The international shipping industry is of great economic importance, with a majority of worldwide transported goods being carried out by ocean-going ships. Such economic impact also comes with an environmental footprint – particularly carbon and sulfur dioxides. This poses both risks and opportunities for the shipping industry due to its significance and potential role in optimizing global supply chains for its customers. As in other industries, green strategies are about seizing opportunities and creating value for customers, shareholders and other stakeholders. The industry is governed by a global and uniform regulatory framework created by the [International Maritime Organization \("IMO"\)](#). The framework has significantly contributed in lessening the industry's impact on the environment by enforcing the adoption of certain technical and operational measures. One of the basic frameworks of the IMO has been the [International Convention for the Prevention of Pollution from Ships \("MARPOL"\)](#). Since its ratification in 1973, MARPOL has undergone numerous amendments, continuously expanding its framework to require increasing compliance from the shipping industry.

Environmental regulation affects the ownership and operation of our vessels in a significant manner. The Company is subject to international conventions and national, port state and local laws and regulations applicable to international waters and/or territorial waters of the countries in which our vessels may operate or are registered.

The environmental impact of our operations relates mainly to (i) emissions from container vessel fuel consumption, (ii) the risk of major environmental accidents, (iii) waste management including ballast water and spills, and (iv) the disposal of vessels at the end of their useful life.

Our vessels run on ordinary heavy fuel oil or gasoil. The potential for major environmental accidents relates to the risk of a vessel accidentally running aground or suffering a breach, with a subsequent leak of bunker oil into the environment. The last potential impact is waste produced by the vessels, discharge of untreated ballast water and potential spills of chemicals, bilge water and sludge etc. into the environment. Discharge of untreated ballast water may potentially introduce non-native organisms into marine environments worldwide.

MPCC's Environmental Policy ([link](#)) includes the following principles:

- upgrading our fleet by investing into energy efficiency measures and technology to reduce our carbon footprint, if economically reasonable;
- continuously measure the impact and relevant KPIs of our fleet;
- follow an ambitious and proactive approach to environmental challenges;
- undertake initiatives to promote greater environmental responsibility, such as marine pollution mapping; and
- encourage the development and diffusion of environmentally friendly technologies.

To achieve our commitment to environmental protection, we will:

- comply with all relevant local, national and international environmental laws and regulations;
- continuously optimize vessel performance and proactively explore viable options for reducing pollutants, GHG emissions and SOx emissions;
- make sure that a Ship Energy Efficiency Management Plan is created and implemented for each ship, to improve long-term operating efficiency;
- identify, avoid, minimize, manage, and monitor environmental impacts, including any harmful pollution or contamination;
- ensure our third-party technical managers are certified according to ISO 9001:2015 and 14001:2015 or otherwise certify satisfactory quality and environmental management systems suitable for the deliverables to us;
- aim for zero harmful operational indirect and accidental discharges;
- eliminate or reduce resource waste; and
- ensure all employees, contractors and suppliers are aware of this policy and expect that our contractors and suppliers do the same for their employees.

In accordance with these principles, MPCC is continuously working on optimizing fleet operations in terms of e.g., speed/fuel consumption. The Company has retrofitted selected vessels with exhaust gas cleaning systems ("scrubbers") as one alternative measure to comply with the IMO's January 2020 sulfur emission cap regulation. Remaining vessels will operate on compliant low-sulfur fuel oils. Through participation in maritime environmental organizations such as the [Clean Shipping Alliance 2020](#), which seeks to provide information and research data to inform industry stakeholders on the environment performance and benefits of open- and closed-loop Exhaust Gas Cleaning Systems and water emissions, and the [Maersk-Mc-Kinney Moller Center for Zero Carbon Shipping](#), MPCC aims to align our company with networks of like-minded industry peers and support efforts for sustainable shipping.

MPCC and its CEO are founding members and ambassadors of [Eyesea](#), which is a non-profit organization that set up to map and report global pollution and maritime hazards,

To benchmark and monitor the Company's Carbon Intensity Indicator ("CII") performance MPCC supported the German-based software company ZERO 44, in the development of a CII-monitoring and forecasting software tool. MPCC aims to retain a C-rating as a minimum for its fleet which requires fleet investments and upgrades in the coming years.

All of our vessels have ballast water treatment systems in place according to the [IMO's Ballast Water Management Convention](#) so as to prevent the spread of potentially harmful aquatic organisms and pathogens in the ships' ballast water.

Our Business Partner Guideline ([link](#)), which all our business partners need to adhere to, includes the business partners' obligation to adhere to the same corporate responsibilities as MPCC. This explicitly includes their commitment to comply with our principles as set out in our ESG-Policies ([link](#)) which inter alia include our Environmental Policy ([link](#)) and our Ship Recycling Policy ([link](#)).

The ship recycling industry supports the economy of many developing countries and functions as an important contributor to global sustainability by recycling metals and other components, hence extending the useful life of these resources. MPCC is committed to sustainable and socially responsible recycling of ships, thereby safeguarding the environment, human health and safety.

Many ships of the world fleet are being dismantled outside the EU under conditions that are often harmful to workers' health and the environment which we would regard as the highest risk in connection with ship recycling. Since 31 December 2018, the [EU Ship Recycling Regulation](#) has required all large sea-going vessels sailing under an EU Member State flag to use an approved ship recycling facility included in the [European List of ship recycling facilities](#) to exclude such risks. The European List is regularly updated to add further compliant facilities or to remove facilities that have ceased to comply. To be included in the European List, any ship recycling facility, irrespective of its location, has to comply with a number of safety and environmental requirements. For facilities located in the EU, competent national authorities must check that all the relevant conditions are met, and then inform the Commission that the facility should be listed. Ship recycling facilities located in third countries and intending to recycle ships flying a flag of a Member State have to apply to the Commission for inclusion in the European List.

To avoid negative effects on workers' health and the environment, and though MPCC has not recycled any of its vessels up to now, any recycling will be conducted in accordance with MPCC's Ship Recycling Policy, and the strict principles included therein, which oblige MPCC:

- To carry out all recycling of vessels in accordance with applicable laws and regulations, including but not limited to the [2009 Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships](#), the [Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes and their Disposal](#), the EU Ship Recycling Regulation, and, where applicable, the US EPA Recycling Regulations and to recycle its vessels built after 2020 in accordance with the EU Ship Recycling Regulation, even if this should not be mandatory under its terms or other applicable laws and regulations;
- to prioritize the safeguarding of the environment and human health and safety when recycling vessels; and
- if selling a ship, that can be reasonably expected to be recycled within two years after the transaction, to only cooperate with a buyer that follows the same principles as MPCC does in respect of the recycling of the ship.

The Company subcontracts performance of technical ship management services to firms that have environmental policies and procedures in place. Our aim is to conduct operations with the utmost regard for the safety of employees, the public, the environment and to meet or exceed the industry and customer's requirements. Third party managers are certified according to e.g. ISO 9001:2015 (Quality Management System) and ISO 14001:2015 (Environmental Management System), or otherwise certify satisfactory quality and environmental management systems suitable for the deliverables to us, and are required to comply with applicable regulations, codes, guidelines and standards such as the [IMO's ISM Code](#).

Quality, Health and Safety

The Company's policy is to operate our business in a manner designed to protect the health and safety of our employees, customers, the public and the environment, and in accordance with all applicable environmental and safety laws and regulations to ensure the protection of the environment, our personnel and property.

Our employees should conduct themselves in a manner that is consistent with this policy. Any departure or suspected departure from this policy must be reported promptly.

MPCC shall be a professional and positive workplace with an inclusive working environment. All employees shall help to create a work environment free from any discrimination due to e.g. religion, skin color, gender, sexual orientation, age, nationality, race and disability. We do not tolerate behavior that can be perceived as degrading or threatening.

In accordance with our Health & Safety Policy ([link](#)) our main principles are:

- commercial considerations will never come before the safety considerations of personnel;
- personal incidents are unacceptable and should be prevented at all times;
- our operations are undertaken with due regard to safety requirements and operate our business in a manner designed to protect the health and safety of our employees, seafarers, customers, public and the environment; and

to achieve the highest possible level of health and safety, both onshore and onboard our vessels. Our corresponding measures are described in the following sections of this CSR statement.

Seafarer crewing is subcontracted to third party ship managers who comply with e.g., the [IMO's ISM Code](#), [Safety of Life at Sea \("SOLAS"\) Convention](#), [International Convention on Standards of Training, Certification and Watchkeeping for Seafarers](#) as well as the [ILO Maritime Labor Convention](#). Masters, officers and ratings must be qualified, certified and experienced in their duties. This qualification level has to be maintained by regular training and education. Accidents, incidents, near-miss incidents and non-conforming processes are investigated and deficiencies are identified, analyzed and evaluated.

Anti-corruption

Value creation at MPCC must be achieved in compliance with our Code of Conduct ([link](#)) and applicable legislation. The Company's overarching goal is to develop a corporate culture characterized by good judgement and the ability to deal with difficult situations. MPCC has zero tolerance for corruption, price-fixing agreements, market sharing or other practices that hamper free competition. Our Code of Conduct describes the Company's standards and guidelines relating to key integrity issues. The management is responsible for communicating the MPCC Code of Conduct to every employee and making all employees who may be exposed to risk aware of the requirements in the anti-corruption and competition law manuals.

As part of the Company's due diligence procedures in connection with acquisitions and major investments, we assess the risk of becoming involved in breaches of anti-corruption and competition law. MPCC operates its vessels world-wide and has business partners all over the world. In theory bribery and corruption can happen on several occasions during the operation of our vessels and in our supply chain. Thereby, the highest risk of bribery and corruption is in our view present in countries with a high corruption perceptions index.

The Company will take necessary risk-mitigating actions to prevent itself and, where deemed necessary, also independent business partners, including customers and joint venture partners, from participating in corruption or other illegal or unethical activities in connection

with their business dealings with MPCC.

MPCC is a member of the [Marine Anti-Corruption Network](#), which is a global business network towards its vision for a maritime industry free of corruption that enables fair trade to the benefit of society at large.

MPCC's Anti-Corruption Policy includes the following principles:

- We do not tolerate active corruption (attempts to bribe others by e.g., offering or giving anything of value) or passive corruption (allowing oneself to be bribed by way of demanding, soliciting, receiving, accepting, etc. an offer of an improper advantage).
- Gifts must be made openly. They must not be made in the form of cash, must have a clear, legitimate basis in local business relationships and must have a minimal cash value.
- Expenses relating to travel, meals and events paid for customers or other persons must be clearly justified by business considerations, must be reasonable and well documented and must be paid openly.
- We do not tolerate acts of corruption carried out by our agents or representatives. Agents and other representatives acting on behalf of the Company must comply with the same anti-corruption standards as MPCC.
- MPCC must not make financial contributions to political campaigns or the like.

To comply with our anti-corruption principles,

- we will inter alia ensure all employees, contractors and suppliers are aware of this policy, provide training on relevant anti-corruption topics to our employees and expect that relevant contractors and suppliers provide similar training to their employees;
- comply with all relevant local, national and international laws and regulations, including the [Foreign Corrupt Practices Act](#), the [UK Bribery Act](#) and the [OECD Anti-Bribery Convention](#);
- conduct due diligence in connection with acquisitions and major investments to assess the risk of becoming involved in breaches of anti-corruption and competition law;
- take necessary risk-mitigating actions to prevent business partners from participating in corruption in connection with their business dealings with MPCC and its subsidiaries;
- manage and monitor our anti-corruption; and
- reject transactions where money laundering cannot be excluded.

MPCC's business partners have to confirm adherence to the Company's Business Partner Guideline ([link](#)), according to which they inter alia undertake to obey the same corporate responsibilities as MPCC. This includes compliance with MPCC's principles laid down in its ESG policies ([link](#)), and the business partners' obligation to use best efforts to assure that they are and will continue to be in compliance with the provisions of applicable anti-corruption laws, including where applicable the [United Nation's Convention against Corruption \(2005\)](#), the [Foreign Corrupt Practices Act](#) and the [UK Bribery Act](#).

MPCC's employees and the seafarers on board of our vessels are trained in bribery and anti-corruption matters either by ourselves or by the external managers responsible for the crew.

Our procedures require a thorough investigation of each case where there are reasonable grounds to suspect a breach of any of the above principles. However, to date, we have not been made aware of any instances of bribery or corruption by our employees or crew on board our vessels.

Human rights

The Company's business has a direct impact on the human rights of not only our employees, but people across the globe, both through our supply chain and in the trading areas we operate in.

We conduct our operations in a way that preserves the inherent dignity of every person we impact. Although we may not have a business relationship with everyone throughout the entire supply and value chain directly, we acknowledge the impact we have and our responsibility going along with it. We work on increasing the visibility to ensure that the human rights of those we do not have a direct relationship with are respected.

MPCC is committed to respecting human rights as defined in [the International Bill of Human Rights](#), the [ILO Fundamental Conventions on Labour Standards](#) and the UN [Guiding principles on Business and Human Rights](#).

MPCC's Human Rights Policy ([link](#)) includes the following principles:

- we strive to foster a diverse workforce and ensure a constructive and pleasant working environment;
- support and respect the protection of internationally proclaimed human rights; and
- make sure that we are not complicit in human rights abuses.

Notwithstanding our commitment to respect all human rights, our salient human rights issues are:

- Crew working conditions;
- Ship recycling;
- Diversity, discrimination and minority rights;
- Supply chain management;
- Search and rescue; and
- Security response to piracy.

In accordance with the [Norwegian Transparency Act](#), we have evaluated if and how in respect of these salient human rights matters, our existing procedures could be improved where reasonable or necessary to cease, prevent and mitigate potential human rights impacts. The results of this assessment can be found in detail in our Norwegian Transparency Act Statement 2023 ([link](#)).

To achieve our commitment to respect human rights, we will:

- comply with all relevant local, national and international laws and regulations;
- not tolerate any human rights violations or indecent working conditions, neither internally nor from suppliers or service providers
- ensure all employees, contractors and suppliers are aware of this policy and expect our contractors and suppliers to follow the same principles;
- provide training on relevant human rights topics to our employees, and expect our contractors, to do the same; and
- seek to continually improve our human rights performance.

Furthermore, our Human Capital Policy ([link](#)) includes the following principles, which apply to everyone at MPCC and its subsidiaries and we expect this policy to be followed by our ship

and crew managers, contractors, temporary personnel, and those who act on behalf of us or represent us:

- our business should value our workforce and crew, and seek to improve its skills and wellbeing;
- we strive to foster a diverse workforce and ensure a constructive and pleasant working environment;
- we have zero tolerance for harassment and discrimination in all its forms; and
- our business is not separate from the communities we operate in and we aim to develop and/or keep positive relationships and impacts with them.

Following these principles, we will:

- comply with all relevant local, national and international environmental laws and regulations;
- put in place programs for the coaching, retention and professional development of our employees and expect our crew managers to do the same;
- prioritize the wellbeing of our employees by establishing communication channels that allow us to better understand their needs and expect our crew managers to do the same;
- ensure that all employees, no matter which gender they have and whether they may have a minority background, are paid equally for equal work, and expect our crew managers to do the same;
- provide training for our employees on non-discrimination and workplace harassment and expect our crew managers to provide similar training for the crew; and
- encourage the employment of people of non-male gender, who are equally qualified for the relevant position, and act accordingly.

To meet these principles and objectives, we regularly conduct crew health and wellbeing surveys on board our vessels to identify areas for improvement and take action. The last survey took place in 2022 and the two areas that stood out from the results were overweight/obesity and loneliness. Several actions have been taken to improve this. For example, information on mental health and healthy eating was provided to crew members, and a webinar on nutritionally balanced calendar menus was held. Photography competitions have been organized as team events, and in 2024 an improvement in internet bandwidth on board will be introduced. In addition, crew shore leaves are now possible again, now that the covid restrictions have been largely lifted. In addition, there are annual crew seminars where crew members are coached and trained. The next health and wellbeing survey is scheduled for 2024 and we hope to gain insight into the success of our measures then.

To address that MPCC does not tolerate any human rights violations or indecent working conditions, neither internally nor from suppliers or service providers, MPCC's Business Partner Guideline, which MPCC's business partners are expected to adhere to, requires them to operate their business in accordance with fundamental human rights as enshrined in the [United Nations Universal Declaration of Human Rights](#), to follow the standards of the International Labor Organization, which are guiding principles encouraged and implemented by the European Union, to support and respect the protection of internationally proclaimed human rights including but not limited to the ban of child labor, forced labor and human trafficking and to prohibit unlawful discrimination on the account of ethnic or national origin, age, sex or religion.

In accordance with the provisions of the Business Partner Guideline ([link](#)), MPCC has the

right to audit Business Partners' compliance with the requirements set forth in this guideline including their observance of human rights. For this purpose, Business Partners shall allow MPCC or its representatives full access to its facilities, worker records and workers for confidential business partner audits. However, given the large number of suppliers and their international locations, this is realistically possible only in individual cases. MPCC will exercise this right in events where it has reasonable and concrete reason to believe that the supplier or service provider in question has violated human rights or failed to provide decent working conditions. And if it is found that there is or has been a human rights violation or that there are or have been indecent working conditions, MPCC will exercise its rights under the Business Partner Guideline, which may result in the immediate termination of the relevant contract.