



TRANSPARENCY ACT STATEMENT FOR 2025

ABOUT THIS REPORT

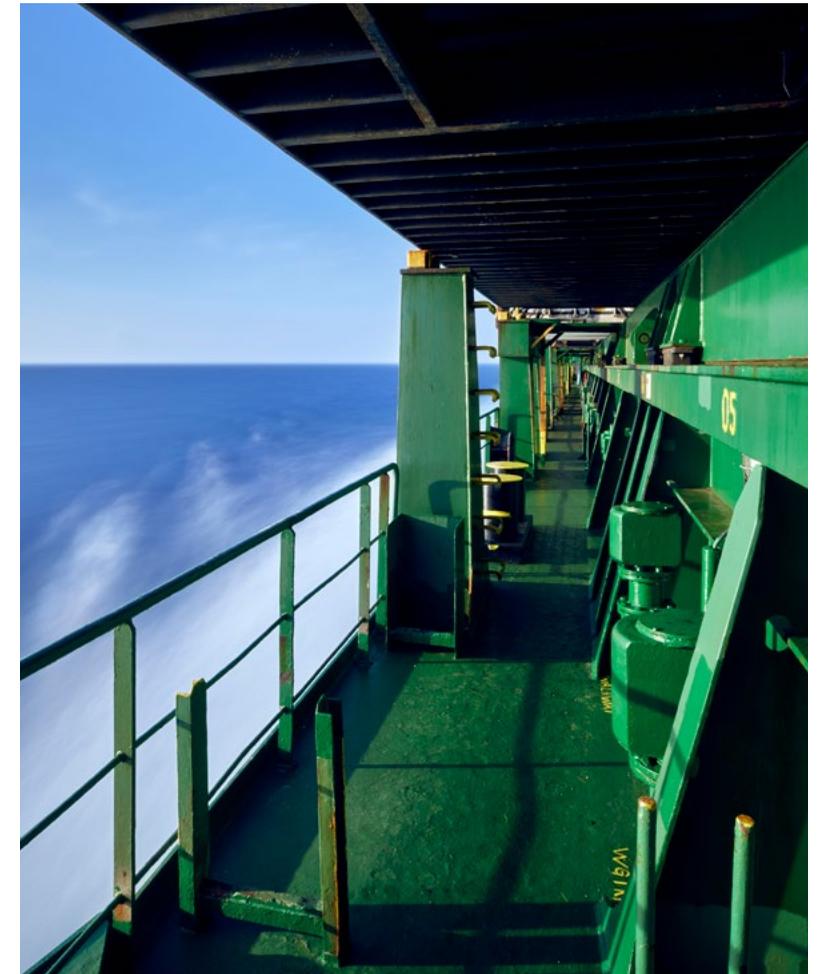
This statement has been prepared in accordance with Section 5 of the Norwegian Transparency Act (Åpenhetsloven). It covers MPC Container Ships ASA ("MPCC" or the "Company") and its subsidiaries (together the "Group") and describes the Group's work to identify and address actual and potential adverse impacts on human rights and decent working conditions in its operations and value chain for the period 1 January to 31 December 2025. The statement will be published on MPCC's website no later than 30 June 2026.

Handling of Information Requests

In accordance with Section 6 of the Transparency Act, any person may submit a written request to MPCC for information about how the Company addresses actual and potential adverse impacts on human rights and decent working conditions in its operations and value chain.

Requests may be submitted in writing to: ir@mpc-container.com.

Where the volume or nature of the information requested makes it disproportionately burdensome to respond within three weeks, MPCC may extend the deadline to up to two months. In such cases, MPCC will notify the requester within three weeks of receipt, stating the reason for the extension and the expected response date. If a request is denied in whole or in part, MPCC will state the legal basis for the denial and inform the requester of their right to demand a more detailed justification within three weeks of receiving the denial. The Consumer Authority (Forbrukertilsynet) is the supervisory and guidance body under the act.



ABOUT MPC CONTAINER SHIPS

MPCC is a container shipping company established in 2017 and engaged in global marine transportation of containerized goods. Since its inception, MPC Container Ships has undergone rapid growth to become one of the world's leading container tonnage providers. Its main activity is to own and operate a portfolio of container ships serving intra-regional trade lanes on fixed-rate charters.

MPC Container Ships employs a diverse team of approximately 40 industry professionals covering all critical functions essential to our operations. There are also around 1,400 seafarers serving aboard our vessels, who are essential to the Group's operations and the seamless transportation of goods across the globe.

While we sub-contract commercial and technical ship management and crewing services to third-party providers, we maintain rigorous oversight and accountability for their performance, ensuring quality and efficiency in our services.

Our operations extend across three key locations: Oslo, Norway; Hamburg, Germany; and Rhon, The Netherlands. These strategically positioned offices support our commitment to delivering exceptional services to our global clientele.

Supply Chain

MPCC's supply chain encompasses a range of suppliers, service providers, and business partners that support the Group's container shipping operations. The Company's principal supply chain activities include:

- + **Technical ship management:** MPCC sub-contracts technical management of its vessels to third-party technical managers, who are responsible for vessel maintenance, crewing, and day-to-day operational compliance. Technical managers are subject to regular monitoring and annual due diligence reviews by MPCC.
- + **Crewing and seafarer services:** Crew members serving on MPCC's vessels are recruited and employed through crewing agencies engaged by the technical managers. These agencies operate across a range of jurisdictions and are subject to MPCC's expectations regarding fair labor practices, health and safety, and compliance with the Maritime Labour Convention (MLC 2006).
- + **Commercial ship management:** Commercial management services, including chartering and vessel employment, are sub-contracted to third-party commercial managers operating in the intra-regional container trade markets where MPCC's vessels are deployed.

- + **Vessel supply and procurement:** The technical managers procure goods, spare parts, lubricants, provisions, and other consumables on behalf of MPCC's vessels through a network of suppliers across multiple geographies.
- + **Port services:** MPCC's vessels call at ports across multiple regions, where port agents, terminal operators, and stevedores provide local services that support cargo operations.
- + **Ship recycling:** At the end of a vessel's operational life, MPCC requires that ship recycling be carried out in accordance with applicable international conventions, including the Hong Kong Convention and the EU Ship Recycling Regulation.

Given the global and multi-layered nature of its supply chain, MPCC recognizes that the most significant human rights and decent working conditions risks are concentrated at the level of seafarers and workers engaged by technical managers, crewing agencies, and ship recycling yards. MPCC addresses these risks through its due diligence framework, contractual requirements, and ongoing monitoring of its key business partners.

GUIDELINES AND PROCEDURES

To achieve its business objectives and fulfil its responsibilities to customers, shareholders, regulators, and society, MPCC emphasizes working with partners who uphold high standards of business practice.

MPCC is committed to protecting human rights in all its operations, regardless of the countries in which it operates. The Board of Directors has established a Business Partner Guideline to ensure transparency, good corporate conduct, beneficial business relationships, and aligned interests. This guideline reflects MPCC's core values and commitment to high business standards.

All business partners are required to follow the Business Partner Guideline, maintaining high standards of ethics and integrity in dealings with employees, suppliers, business partners and public authorities. Partners must practice fairness, honesty, and integrity and avoid any unfair practices or discrimination based on ethnicity, national origin, age, sex, or religion. Respect for the individual is a cornerstone of MPCC, and all persons shall be treated with dignity and shall not be unreasonably interfered with the conduct of their duties and responsibilities.

Business partners must uphold the same corporate responsibilities as MPCC, including operating with integrity, respecting laws, human rights, diverse cultures, and human dignity, in line with the United Nations Universal Declaration of Human Rights and the standards of the International Labour Organization, and the OECD Guidelines for Multinational Enterprises. This includes, but is not limited to, the prohibition of human trafficking, forced labor, exploitative working conditions and practices, slavery and child labor.

In addition to MPCC's Business Partner Guideline, the Company's approach to responsible business conduct and human rights due diligence is embedded across a suite of internal policies. Collectively, these policies reflect and operationalize the six-step due diligence model set out in the OECD Guidelines for Multinational Enterprises, which also forms the normative foundation of the Norwegian Transparency Act:

OECD DUE DILIGENCE STEP	MPCC POLICY	HOW IT ADDRESSES THE STEP
Step 1: Embed responsible business conduct into policies and management systems	Business Partner Guideline; Code of Conduct; Corporate Social Responsibility Statement	Establishes MPCC's overarching expectations for ethical conduct, human rights, and integrity across the organization and its value chain. Provides the governance framework within which all other due diligence activities operate.
Step 2: Identify actual and potential adverse impacts	Human Rights Policy; Ship Recycling Policy	The Human Rights Policy sets out MPCC's methodology for identifying human rights risks across its operations and supply chain. The Ship Recycling Policy addresses sector-specific risks associated with end-of-life vessel disposal, including labor conditions at recycling yards.
Step 3: Cease, prevent, or mitigate adverse impacts	Human Capital Policy; Health and Safety Policy; Ship Recycling Policy	The Human Capital Policy and Health and Safety Policy set out concrete measures to prevent adverse impacts on workers in MPCC's operations, including seafarers. The Ship Recycling Policy includes requirements designed to mitigate risks in third-party recycling facilities.
Step 4: Track implementation and results	Code of Conduct; Corporate Social Responsibility Statement	MPCC monitors compliance with its conduct expectations through its whistleblowing platform, internal reporting, and annual review of the CSR Statement, enabling the Company to track whether mitigation measures are working in practice.
Step 5: Communicate how impacts are addressed	Corporate Social Responsibility Statement; this Transparency Act Statement	MPCC publicly discloses its due diligence approach and findings through its annual Transparency Act statement and CSR reporting, in accordance with Section 5 of the Transparency Act.
Step 6: Provide for or cooperate in remediation	Code of Conduct; Human Rights Policy	Where adverse impacts are identified, MPCC's Code of Conduct and Human Rights Policy establish the Company's commitment to remediation, including through its whistleblowing channel, which is open to both internal and external stakeholders and allows for anonymous reporting.

Together, these policies form an integrated framework designed to ensure that human rights and decent working conditions considerations are not treated as isolated compliance requirements, but are embedded into MPCC's day-to-day operations, commercial relationships, and governance structures.

MPCC encourages employees and stakeholders to raise concerns if malpractices or wrongdoings are suspected. MPCC operates an ISO 27001-certified and GDPR-compliant whistleblowing platform, accessible via the Company's website, open to both internal and external stakeholders. Concerns may be reported openly or anonymously and are investigated and handled confidentially in accordance with established procedures. Individuals are protected and treated respectfully throughout the process.

STAKEHOLDER ENGAGEMENT, GRIEVANCE MECHANISMS, AND REMEDIATION

Stakeholder Engagement

MPCC engages with internal and external stakeholders as part of its ongoing human rights due diligence process. Shore-based employees are engaged through internal communications, policy reviews, and direct access to the compliance function. Seafarers are engaged through vessel inspections, crew welfare assessments, and compliance monitoring conducted in accordance with the Maritime Labour Convention (MLC 2006). MPCC supports seafarers' rights to organize and expects its technical managers to comply with applicable collective bargaining agreements.

Suppliers and business partners are engaged through onboarding due diligence, contractual requirements, and periodic reviews. Where relevant, MPCC also engages with industry organizations and civil society groups to stay informed of systemic risks in the shipping sector.

Where an adverse impact is identified, MPCC is committed to communicating directly with affected stakeholders and rights-holders regarding the steps taken to address it.

Grievance Mechanisms

In addition to its whistleblowing platform, MPCC maintains accessible grievance channels for both internal and external stakeholders, including direct written complaints to the compliance function. Seafarers have access to onboard grievance procedures in line with MLC 2006. All concerns are handled confidentially, and retaliation against anyone raising a concern in good faith is strictly prohibited.

Remediation

Where an adverse impact is identified, MPCC is committed to taking appropriate remediation steps proportionate to the severity of the impact. This includes investigating the matter, engaging with affected parties, requiring corrective action from relevant business partners, and – where necessary – terminating the business relationship. The compliance and legal function leads the remediation process, with reporting to senior management and the Board as appropriate. Outcomes are documented and, where material, reflected in MPCC's annual Transparency Act statement.

MAIN RISKS AND RISK MANAGEMENT

As part of the maritime industry, MPCC's shipping operations and global supply chain involves a high degree of inherent risk, which can impact workers' well-being, safety, and rights across MPCC's value chain, including seafarers, ship recycling workers, and other supply chain workers. MPCC remains committed to mitigating these risks and prioritizing worker safety and well-being throughout its operations and partnerships.

MPCC conducts annual risk assessments to identify actual and potential adverse impacts on human rights and decent working conditions across its operations and value chain, in line with the Transparency Act and the OECD Guidelines for Multinational Enterprises.

The 2025 risk assessment identified the following key areas where there may be potential risks to human rights or decent working conditions:

- + Seafarer working conditions – including risks related to working hours, fatigue, health and safety, and fair working conditions for crew members.
- + Supply chain labor conditions – including the risk of unsafe working environments, discrimination, or other labor rights violations among suppliers and service providers.
- + Ship recycling – including risks related to unsafe working

conditions and potential labor rights violations in ship recycling yards in certain jurisdictions.

- + Maritime security risks – including piracy or other security incidents that may affect the safety and wellbeing of seafarers.

MPCC seeks to mitigate these risks through policies, contractual requirements, monitoring procedures and cooperation with technical managers and business partners. The Company promotes fair labor practices, safe working environments and responsible supply chain management through the implementation of its Human Rights, Health and Safety, Sustainability, and Human Capital policies.

Technical managers engaged by MPCC are subject to regular follow-up and monitoring. As part of the Company's due diligence procedures, technical managers complete an annual questionnaire covering topics related to human rights, labour standards, supply chain management, ESG matters and anti-corruption practices. The responses and supporting documentation are reviewed in order to assess compliance with MPCC's expectations and applicable standards.

MPCC also maintains policies governing responsible ship recycling. The Company's Ship Recycling Policy requires recycling activities to be conducted in accordance with applicable international conventions and regulations, including the Hong Kong International

Convention for the Safe and Environmentally Sound Recycling of Ships, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and the EU Ship Recycling Regulation.

During the reporting period, MPCC's due diligence assessments did not identify actual adverse impacts on human rights or decent working conditions within the Group's own operations. No confirmed adverse impacts were identified in the supply chain through the due diligence activities conducted during the period. MPCC acknowledges that the absence of identified impacts does not eliminate the possibility of undetected risks, and will continue to develop its monitoring and assessment capabilities accordingly.

PRIORITIES

During 2025, MPCC has continued its efforts to follow-up and monitor the assessment of its operations and suppliers and focus on constantly reviewing its procedures for potential improvements and updates. This will continue into 2026 and will remain a part of our continuous focus of improving our procedures. In addition, our key priorities for 2026 will be to:

- + Continue annual reviews of the procedures of technical managers and crewing agencies.
- + Further developing procedures for monitoring and follow-up of suppliers and other business partners.
- + Monitor developments of applicable laws and regulations and own experiences to amend and/or extend our policies and guidelines where necessary or reasonable.
- + Continue to explore initiatives that promotes crew safety and wellbeing onboard our vessels.
- + Conducting targeted audits of suppliers and service providers where we have reasonable and concrete reason to believe that they have violated human rights or failed to provide decent working conditions.
- + Continuing employee training related to the Code of Conduct, compliance, sustainability and human rights topics.

Oslo, March 26, 2026

The Board of Directors and Chief Executive Officer of MPC Container Ships ASA

Electronically signed

Ulf Stephan Holländer
Chairman of the Board

Ellen Merete Hanetho
Member of the Board

Pia Meling
Member of the Board

Peter Frederiksen
Member of the Board

Petros Panagiotidis
Member of the Board

Constantin Baack
CEO

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