

MPC Container Ships ASA: Anti-Corruption Policy

Corruption can take various forms, ranging from but not limited to demanding small gifts to substantial cash payments. Industrial Shipping relies on meeting tight deadlines over vast distances on a global scale, making it vulnerable to demands for bribes in order to avoid delays and the associated costs. Bribery and corruption undermine the rules of law and the principles of fair competition, causing significant damage to the industry in which we operate as well as society in general. We are committed to playing our part in supporting an ethical maritime industry.

MPC Container Ships ASA ("**MPCC**" or the "**Company**", together with its subsidiaries the "**Group**") has zero tolerance for corruption, money laundering, price-fixing agreements, market sharing or other practices that hamper free competition.

This policy applies to everyone at MPC Container Ships and its subsidiaries and we expect this policy to be followed by our ship managers, contractors, temporary personnel, and those who act on behalf of or represent us and third-party personnel, throughout our supply and value chains.

Our principles with regard to anti-corruption:

- we do not tolerate active corruption (attempts to bribe others) or passive corruption (allowing oneself to be bribed);
- 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 not have a cash value of more than \$150;
- expenses relating to travel, meals and events paid for by customers or other persons must be justified by business considerations, must be reasonable, well-documented and paid openly;
- we do not tolerate acts of corruption carried out by our agents or representatives; and
- MPCC must not make financial contributions to political campaigns or the like.

To achieve our anti-corruption principles, we will:

- ensure all employees, contractors and suppliers are aware of this policy and the requirements set out in our Code of Conduct and expect our contractors and suppliers to make their employees aware of the same;
- provide training on relevant anti-corruption topics to our employees and expect that relevant contractors and suppliers will provide similar training to their employees;
- comply with all relevant local, national and international laws and regulations, including the FCPA, 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;

- manage and monitor our anti-corruption efforts and provide an independent whistleblowing channel; and
- reject transactions where money laundering cannot be excluded.

The Chief Compliance Officer takes ownership for this policy and has responsibility for its implementation. This policy will be reviewed every year.