

## NORWEGIAN TRANSPARENCY ACT STATEMENT

Adopted by the Board of Directors  
on 20 June 2023

### 1. EMBED RESPONSIBLE BUSINESS CONDUCT

MPC Container Ship ASA ("**MPCC**" or the "**Company**", together with its subsidiaries the "**Group**") is a container shipping company established in April 2017 and engaged in the global marine transportation of containerized goods. The main business activity of the Group is to invest in maritime assets with a particular focus on feeder container vessels, chartering out the vessels per time charter agreements, operate and sell them.

The Company's shares are listed on the Oslo Stock Exchange since May 2018. Financial, corporate governance and corporate social responsibility reporting is governed by Norwegian public limited liability company and securities trading legislations, listing rules and continuing obligations as set forth by the Oslo Stock Exchange, and the Norwegian Code of Practice for Corporate Governance. Reporting requirements are supervised by the Norwegian Financial Supervisory Authority (Finanstilsynet).

MPCC's Executive Management consists of the Chief Executive Officer, the Chief Financial Officer, the Chief Operating Officer, and the Executive Vice President / General Manager Norway, and its Board of Directors of five Directors, one of whom is the Chairman.

To achieve MPCC's business objectives whilst committing itself to the responsibility entrusted to it by all stakeholders, e. g. customers, shareholders, regulators, and society, MPCC places great emphasis on cooperating with business partners that promote high standards of good business practice.

Consequently, MPCC's Board of Directors has resolved a Business Partner Guideline to offer transparency, ensure good corporate conduct, mutually beneficial business relationships and alignment of interests. By embedding the company's core values into this guideline, MPCC aims to demonstrate its strong commitment to the business standards it has developed.

MPCC's business partners are expected to adhere to MPCC's Business Partner Guideline pursuant to which Business Partners undertake to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. They must practice fair dealing, honesty, and integrity in every aspect in dealing with employees, MPCC, suppliers, competitors, the public and government authorities. When acting on behalf of the Group, Business Partners shall not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair dealing practices. MPCC requires Business Partners to prohibit unlawful discrimination on account of ethnic or 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 in the conduct of their duties and responsibilities.

In their dealings for the Group, Business Partners must adhere to the same corporate responsibilities as MPCC. This includes but is not limited to operating their business with integrity and respect laws, human rights, different cultures and human dignity and in accordance with fundamental human rights as enshrined in the United Nation Universal Declaration of Human Rights. And it also includes to the obligation to follow the standards of the International Labor Organization, which are guiding principles encouraged and implemented by the European Union.

A breach of this guideline may result in actions being invoked against the Business Partner, in addition to any contractual or legal remedies. Actions applied will depend on the nature and seriousness of the violation and on the degree of commitment shown by the Business Partner. The range of actions available to be imposed on the Business Partner include, but is not limited to, formal warnings that the continued non-compliance will result in more severe actions, disclosure of nature of breach to all sub-contractors, subsidiaries and associate companies, and immediate termination of contract, without recourse. In the next update of the Business Partner Guideline, it is planned to add to this list the Business Partner's obligation to provide for or cooperate in remediation and compensation where required.

In addition to MPCC's Business Partner Guideline, responsibility and approach for human rights can also be found in the following MPCC's other policies and guidelines:

- Human Rights Policy
- Code of Conduct
- Human Capital Policy
- Health and Safety Policy
- Ship Recycling Policy
- Corporate Social Responsibility Statement

Within these policies, MPCC's fundamental business and human rights principles are laid down, including but not limited to the following:

We (i) acknowledge the impact we have and our responsibility going along with the entire supply and value chain, although we may not have a direct business relationship with everyone throughout that chain, (ii) are committed to respecting human rights as defined in the International Bill of Rights, the ILO Fundamental Conventions on Labor Standards and the UN Guiding Principles on Business and Human Rights, (iii) strive to foster a diverse workforce and ensure a constructive and pleasant working environment, support and respect the protection of internationally proclaimed human rights, (iv) make sure that we are not complicit in human rights abuses, and (v) will comply with all relevant local, national and international laws and regulations, identify any negative human rights impacts and avoid or minimize these.

Our employees are required to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to 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. We respect different cultures and human dignity and operate our business with integrity and in accordance with fundamental human rights as enshrined in the United Nations Universal Declaration of Human Rights and follow the standards of the International Labor Organization, which are guiding principles encouraged and implemented by the European Union.

All persons shall be treated with dignity and respect and unlawful discrimination against employees, shareholders, directors, customers, and suppliers on account of ethnic or national origin, race, age, gender, sexual orientation, religion or disability is forbidden. 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 do not tolerate behavior that can be perceived as degrading or threatening.

Our commercial considerations will never come before the safety considerations of personnel and personal incidents are unacceptable and should be always prevented. 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. To achieve the highest possible level of health and safety, both onshore and onboard our vessels, we consider official regulatory requirements as a bare minimum, which we aim not just to meet, but to exceed.

Our principles for ship recycling are to carry out all recycling of vessels in accordance with applicable laws and regulations – including 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 and, where applicable, EU and US EPA Ship Recycling Regulations, and to prioritize the safeguarding of the environment and human health and safety when recycling vessels.

Further details can be found in the above stated policies, which are all available on our website [www.mpc-container.com](http://www.mpc-container.com).

## **2. IDENTIFYING AND ASSESSING HUMAN RIGHTS IMPACTS**

MPCC has conducted a risk assessment to identify potential negative impacts on fundamental human rights and decent working condition based on the fundamental Human Rights Conventions (International Bill of Human Rights and the ILO Conventions). In addition to our own assessment, we had instructed an external specialized service provider to map our salient human rights issues. Its mapping process comprised of the four key stages desktop research, external interviews, an internal workshop, and an analysis which resulted in the following issues being identified as salient:

- Crew working conditions,
- Ship recycling,

- Diversity, discrimination, and minority rights,
- Supply chain management,
- Search and rescue, and
- Security response to piracy.

### **3. CEASING, PREVENTING, AND MITIGATING HUMAN RIGHTS IMPACTS**

We have evaluated if and how in respect of the salient human rights matters identified, our existing procedures could be improved where reasonable or necessary to cease, prevent and mitigate potential human rights impacts:

#### **3.1 Crew working conditions**

3.1.1 The nature of the work of the crew on board our vessels makes it vulnerable to rights abuses, particularly the potential for overtime amounting to forced labor, harassment and poor health and safety conditions. Due to the scale, scope and potential severity of any negative impact, the crew working conditions are salient human rights matters. However, the human rights of the crew are well protected in shipping by several applicable rules and regulations which we, as well as the technical ship managers and crewing agencies involved, strictly follow. The most important rules and regulations are:

##### **(a) The Maritime Labor Convention**

The Maritime Labor Convention ("MLC"), adopted by the International Labor Organization in 2006 and entered into force on 20 August 2013, sets out comprehensive rights and principles to ensure decent working and living conditions for seafarers, regardless of their nationality or the flag of the vessel on which they serve:

The MLC (i) establishes minimum requirements for seafarers' recruitment, employment agreements, working hours, and rest periods, and promotes fair and equal treatment, prohibits forced labor, and ensures access to medical care and social security protection, (ii) sets standards for accommodations, food and catering, recreational facilities, and health and safety on board ships, and aims to ensure that seafarers have decent living conditions while working at sea, (iii) emphasizes the importance of seafarers' welfare, providing for access to shore-based welfare facilities, access to shore leave, and repatriation after their contracts end, and addresses issues related to seafarers' social security rights, including access to healthcare and social benefits, and (iv) established a framework for effective enforcement of its provisions by flag states, which are responsible for ensuring that ships flying their flag comply with the Convention, and it also promotes cooperation among port states to inspect ships and verify compliance with MLC requirements.

##### **(b) The International Maritime Organization's ISM Code**

The ISM Code was adopted by the International Maritime Organization ("IMO") in 1993 and became mandatory for certain types of vessels on 1 July 1998. It refers to the International Safety Management Code and is an international standard for the safe management and operation of ships and the prevention of accidents and pollution at sea. The ISM Code aims to enhance safety at sea, prevent marine pollution, and promote a culture of safety within the shipping industry. By implementing effective safety management systems, companies and ships can identify potential hazards, manage risks,

and continuously improve their safety performance, which is also a key factor in respect of human rights.

The ISM Code requires shipping companies to develop and implement a safety management system that outlines policies, procedures, and guidelines for safe ship operations, and it covers areas such as shipboard operations, emergency preparedness, maintenance of ship and equipment, crew training, and reporting of accidents and near-miss incidents. Each shipping company is required to appoint a Designated Person Ashore ("DPA"). The DPA is responsible for monitoring the safety management system's implementation, providing guidance to the shipboard personnel, and serving as a point of contact for communication between the company and the ship. The ISM Code also defines the roles and responsibilities of the shipping company and shipboard personnel in implementing the safety management system, and emphasizes the need for clear lines of communication, the allocation of resources, and the establishment of a safety culture. Furthermore, the ISM Code mandates that ships subject to its requirements obtain a Document of Compliance issued to the shipping company and a Safety Management Certificate issued to each ship. These documents are issued after an initial verification process by the flag state administration or its recognized organization. Regular audits and inspections are conducted to ensure ongoing compliance.

#### (c) The Safety of Life at Sea Convention

The Safety of Life at Sea ("SOLAS") Convention is an international maritime treaty that sets minimum safety standards for the construction, equipment, and operation of ships. It was first adopted in 1914 following the sinking of the Titanic and has been revised and updated several times since then. The latest version is SOLAS 1974, which entered into force on 1 July 1980. The primary objective of the SOLAS Convention is to ensure the safety of human life at sea by establishing regulations that address a wide range of maritime safety aspects.

SOLAS (i) specifies requirements for ship construction, stability, subdivision, and watertight integrity to minimize the risk of structural failure and sinking, and sets standards for safety equipment such as lifeboats, life rafts, life jackets, distress signals, fire protection, and firefighting systems, (ii) includes provisions related to the safe operation of ships, covering areas such as navigation, communications, ship handling, safety management, and voyage planning. It addresses topics like ship stability, cargo handling, load lines, and the prevention of collisions at sea, (iii) mandates that ships maintain effective emergency plans and procedures for various scenarios, including abandonment, fire, flooding, and other emergencies, requires the availability of lifesaving appliances, the conducting of drills and exercises, and the establishment of effective communication systems for distress and safety purposes, and (iv) encourages the implementation of safety management systems on ships, and requires companies to establish and maintain procedures and policies to ensure the safe operation of their vessels and the protection of the environment.

SOLAS applies to ships engaged in international voyages, with some provisions also applicable to domestic voyages. It is enforced by flag states, which conduct inspections and issue certificates of compliance to ships that meet SOLAS standards. Port states may also conduct inspections to verify compliance with SOLAS requirements.

#### (d) The International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers

The International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers ("STCW") is an international maritime treaty that sets minimum training, certification, and watchkeeping standards for seafarers. It was first adopted in 1978 by the IMO and entered into force in 1984. The convention has undergone several amendments, with the latest major revision known as the Manila Amendments adopted in 2010.

The primary objective of the STCW Convention is to ensure that seafarers possess the necessary knowledge, skills, and competencies to perform their duties safely and effectively on-board ships. The STCW sets standards for different levels of seafarer certification and addresses various aspects of training and watchkeeping.

The STCW (i) establishes minimum training requirements for seafarers based on their roles and responsibilities on board and sets standards for deck officers, engineers, radio operators, and other crew members, specifying the training courses, duration, and competencies required for each rank, (ii) defines the watchkeeping requirements for seafarers responsible for navigation, engineering, and other shipboard operations, and outlines the hours of rest, duties, and responsibilities of seafarers during their watch periods to ensure the safe and efficient operation of the vessel, (iii) includes provisions regarding the medical fitness of seafarers, and sets standards for medical examinations and certifications to ensure that seafarers are physically and mentally fit to perform their duties at sea, (iv) emphasizes the importance of familiarization and ongoing training to keep seafarers updated with new technologies, regulations, and industry best practices, and requires seafarers to undergo refresher training and participate in proficiency assessments periodically to maintain their competence.

The STCW Convention applies to all ships engaged in international voyages and to seafarers serving on board such vessels. It is enforced by flag states, which are responsible for ensuring compliance with the STCW requirements. Port states also play a role in verifying seafarers' certificates and conducting inspections to ensure compliance.

3.1.3 As per the above, the protection of seafarer's human rights including their safety is well addressed in several applicable rules and regulations which from time to time are amended as necessary. For this reason, MPCC's focus is to follow these rules and regulations and, going forward, to monitor the respective obedience by the technical managers and crewing agencies involved. Accordingly, we plan to establish an annually review of these parties' respective procedures. This also includes the training of the crew on board our vessels by the parties involved to ensure adequate awareness and knowledge of the applicable ethical principles including human rights. The same applies for the review of the parties' procedures for investigation and analysis of accidents, near-miss incidents, and non-conforming processes, as these also have impact on the seafarers' human rights.

## **3.2 Ship recycling**

3.2.1 Ship recycling involves dismantling and recycling old or decommissioned ships to recover valuable materials such as steel, aluminum, and copper. While ship recycling can provide economic benefits and support the demand for raw materials, it also poses several risks and challenges, including those related to human rights. Some of the main risks associated with ship recycling in respect of human rights are:



Ship recycling activities can lead to pollution of air, soil, and water. Improper handling and disposal of hazardous materials, such as asbestos, PCBs, heavy metals, and fuel residues, can result in contamination and damage to ecosystems and human health. The release of pollutants during cutting, burning, and disposal processes can have long-lasting environmental impacts.

Ship recycling involves labor-intensive and hazardous work. Workers are exposed to risks such as accidents, injuries, and fatalities due to heavy machinery, falling objects, toxic substances, unsafe working conditions, and inadequate protective equipment. Lack of proper training and safety measures can further exacerbate these risks. And the release of pollutants during recycling activities can pose health risks to the local communities, including respiratory problems, cancer, and other illnesses.

Ship recycling yards are often located in developing countries where labor and environmental regulations may be lax or poorly enforced. Workers, including migrant laborers, may face exploitative working conditions, including long hours, low wages, lack of social protections, and limited access to health care. Child labor and forced labor can also be prevalent in some ship recycling yards.

3.2.2 MPCC is aware of the environmental and human impact associated with the recycling of ships. However, depending on their age, condition and life cycle, recycling of ships is a necessary part of the shipping business and cannot be generally avoided. Therefore, MPCC acknowledges the necessity of ship recycling being made sustainably and socially responsible, thereby safeguarding the environment, human health, and safety. Although none of MPCC's current vessels is expected to be recycled in near future, to properly address the above necessities, we have established a Ship Recycling Policy according to which MPCC's mandatory principles for ship recycling are:

- to carry out all recycling of vessels in accordance with applicable laws and regulations – including 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 and, where applicable, EU and US EPA Ship Recycling Regulations; and
- to prioritize the safeguarding of the environment and human health and safety when recycling vessels.

The aforementioned rules and regulations, which we have undertaken to comply with, contain a very far-reaching protection of human rights:

(a) The European Union ("EU") Ship Recycling Regulation (Regulation (EU) No 1257/2013)

The regulation applies to EU-flagged ships, as well as non-EU ships calling at EU ports, and it covers ships of not less than 500 gross tonnage.

Ships flying the flag of an EU member state can only be recycled at facilities included in the EU List of Ship Recycling Facilities. These facilities must meet specific environmental and safety requirements, including waste management plans, training programs, and infrastructure for safe and environmentally sound recycling.

Shipowners are required to develop and maintain an Inventory of Hazardous Materials,

which identifies, and documents hazardous materials present in a ship's structure and equipment and must submit a Ship Recycling Plan for the ship to be recycled to the relevant authorities for approval. The Ship Recycling Plan is developed by the operator of the ship recycling facility for each specific ship to be recycled under its responsibility. It outlines the procedures and arrangements for safe and environmentally sound recycling, taking into account the relevant IMO guidelines and resolutions.

EU member states are responsible for monitoring and enforcing compliance with the regulation. They may conduct inspections, issue penalties for non-compliance, and ensure that ships and facilities adhere to the requirements.

The EU Ship Recycling Regulation is closely linked to the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, which is a global framework for ship recycling. The EU regulation serves as an interim measure until the Hong Kong Convention enters into force and is widely ratified, which is not yet the case.

#### (b) The Hong Kong Convention

The Hong Kong Convention sets out the scope and application of its provisions, which cover the design, construction, operation, and preparation for ship recycling, as well as the ship recycling process itself. It establishes standards and requirements for ship recycling facilities, aiming to ensure their safe and environmentally sound operations. It addresses aspects such as site selection, facility design, management systems, and handling of hazardous materials.

Like the EU Ship Recycling Regulation, the Hong Kong Convention requires a ship-specific Ship Recycling Plan to be developed by the respective ship recycling facility prior to the recycling of a ship, taking into account the guidelines developed by the International Maritime Organization for the safe and environmentally sound recycling of the ship. Furthermore, the Hong Kong Convention requires each new ship and, as far as practicable, each existing ship not later than 5 years after the entry into force of the Hong Kong Convention, or before going for recycling if this is earlier, to have on board an International Certificate on Inventory of Hazardous Materials. It identifies and documents hazardous materials on board the ship and assists in proper management and disposal during recycling. In addition, an International Ready for Recycling Certificate shall be issued to verify compliance with the Hong Kong Convention's requirements before the start of the ship recycling.

#### (c) The Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes and their Disposal

The Basel Convention (i) defines hazardous wastes and sets out their scope, and applies to hazardous wastes generated within a country's borders as well as those intended for transboundary movement, and establishes a control system to regulate the transboundary movement of hazardous wastes and requires countries to ensure that such movements are minimized, managed, and disposed of in an environmentally sound manner, (ii) requires participating countries to develop national legislation and regulatory frameworks to implement its provisions effectively, and promotes international cooperation, technical assistance, and capacity building to help countries in waste management and disposal, (iii) emphasizes the environmentally sound management of hazardous wastes, including their minimization, treatment, storage, and disposal, (iv) encourages countries to adopt



best practices, technologies, and standards to prevent pollution and protect human health and the environment, (v) introduces a Prior Informed Consent procedure, which mandates that the exporting country must obtain the consent of the importing country before any hazardous waste shipment takes place, while the importing country can refuse consent if it determines that the waste is not adequately managed or disposed of in an environmentally sound manner, and (vi) adopted an amendment known as the Ban Amendment which prohibits the export of hazardous wastes from developed countries to developing countries for any reason, including for recycling or recovery.

3.2.3 MPCC is committed to complying with all these rules and regulations, and in so doing, to achieving the highest possible standard in ship recycling. Notwithstanding the foregoing, we will keep on monitoring developments of in applicable laws and regulations and other relevant factors also in future and will adjust our Ship Recycling Policy accordingly where necessary or appropriate, to ensure that the highest level of human rights protection is maintained.

### **3.3 Diversity, discrimination, and minority rights**

MPCC promotes gender equality and on board and at shore and has implemented rules regarding zero tolerance for harassment and discrimination and minority rights in its Human Capital and Human Rights Policy. However, we are aware of the fact, that crewing is a largely male-dominated profession and that due to a lack of availability of a sufficient amount of qualified crew members of a different gender, it is still difficult to employ a gender-balanced crew. Accordingly, it would not be reasonable to implement strict quotas that currently could not be met, but we will implement in our Human Capital Policy that the employment of people of non-male gender, who are equally qualified for the relevant position, is to be encouraged, and will act and instruct the crew managers accordingly.

### **3.4 Supply chain management**

3.4.1 For the operation and maintenance of our currently over 60 vessels hundreds of international suppliers and service companies are involved. In such an international supply chain, several human rights risks can arise, such as for example forced labor and trafficking, Child labor, discrimination, inadequate health and safety standards, restrictions on the rights of workers to form trade unions and to engage in collective bargaining, and lack of access to effective remedies for individuals and communities affected by human rights abuse.

3.4.2 Involving and choosing suppliers and service providers for the vessels is typically part of the technical management of the vessels, and as such being made by the technical managers of the vessels. In most of the cases MPCC is not directly involved in the respective processes. But regardless of whether these business partners are involved by the technical managers or by MPCC itself, MPCC does not tolerate any human rights violations or indecent working conditions, neither internally nor from suppliers or service providers.

3.4.3 To address this, 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, 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, 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. However, 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.

3.4.4 MPCC's Business Partner Guideline is regularly reviewed and updated, and the next review is planned for 2023 and we aim to further detail the wording in respect of the human rights. Furthermore, we will review the procedures of the technical managers involved in respect of the implementation of the Business Partner Guideline in all supply and service contracts for MPCC's vessels.

### **3.5 Search and rescue**

3.5.1 Search and rescue ("SAR") operations in shipping can occur in any waterway or region where maritime accidents, distress incidents, or emergencies occur. The specific areas of high SAR activity may change over time due to evolving patterns of maritime traffic, migration routes, and other factors. Currently they are the North Atlantic Ocean, including the waters surrounding Europe, North America, and the Atlantic islands, the Mediterranean Sea, the Gulf of Aden and the Red Sea located off the coast of Somalia and Yemen, the waters around the Maldives, Sri Lanka, and the Andaman Sea, the South China Sea, the Caribbean Sea and the Gulf of Mexico. This means that MPCC owned vessels, which operate globally, may be involved in SAR operations of vulnerable people.

3.5.2 SAR operations play a crucial role in saving lives at sea, particularly in situations where individuals are in distress or facing immediate danger and they can intersect with various human rights, and the way these operations are conducted can have implications for the rights of individuals involved. Human rights that can be affected by SAR operations are in particular the following:

Refugees, asylum seekers, or migrants seeking protection have the right to seek asylum from persecution or other threats in accordance with international refugee and human rights law and are to be treated with dignity and respect for their human rights. This includes providing appropriate shelter, medical care, food, water, and other basic necessities. And the principle of non-refoulement is to be obeyed, that prohibits the return of individuals to countries or territories where they may face persecution, torture, or other serious human rights violations.

Furthermore, rescued individuals have the right to privacy and the protection of their personal information, and to freedom of movement, including the right to disembarkation at a place of safety. And if rescued individuals include children, their rights must be upheld

and protected in accordance with international standards, including the Convention on the Rights of the Child. This includes providing special care, protection, and access to education and appropriate legal procedures.

3.5.3 To ensure that search and rescue procedures meet the required standards for maritime safety, shipping companies and vessels must comply with national and international regulations, such as the International Convention for the Safety of Life at Sea ("SOLAS") and the International Maritime Organization guidelines. For example, SOLAS Regulation 33 requires the master of a ship at sea which is in a position to be able to provide assistance on receiving information from any source that persons are in distress at sea, to proceed with all speed to their assistance, if possible, informing them or the search and rescue service that the ship is doing so. This obligation to provide assistance applies regardless of the nationality or status of such persons or the circumstances in which they are found.

3.5.4 Our risk assessment to identify potential negative impacts on fundamental human rights in relation to SAR operations had confirmed that there were appropriate guidelines in place for procedures when people are in distress, but lacked procedures for the period when rescued people were onboard. Meanwhile the SAR policies of all technical managers of our vessels cover both periods.

### **3.6 Security response to piracy**

3.6.1 Piracy can have a serious impact on the human rights of the seafarers on board our vessels and it is important for MPCC to protect them to the best possible extent.

3.6.2 Piracy continues to be a concern in certain regions around the world, particularly in areas known as piracy hotspots, such as the Gulf of Guinea, the waters around the Malacca Strait, Singapore Strait, the South China Sea, the Red Sea and Bab el-Mandeb Strait, particularly near the coast of Yemen, while the so-called Indian Ocean High Risk Area ("HRA") was withdrawn by the shipping industry as from 1 January 2023 after more than a decade of effective threat-reducing counter-piracy operations. The HRA was centered on the Gulf of Aden, extending southward towards the coast of Somalia and eastward towards the Arabian Sea and its purpose was to provide shipping companies and vessels with guidance and recommended security measures to mitigate the risk of piracy. The removal of the HRA reflects a significantly improved piracy situation in the region, largely due to concerted counter-piracy efforts by many regional and international stakeholders, such as international naval forces, along with enhanced security measures by the shipping industry. No piracy attacks against merchant ships have occurred off Somalia since 2018.

3.6.3 To protect the crew on board of MPCC vessels MPCC follows the Best Management Practices for Protection against Somalia Based Piracy ("BMP"), which has gone through several iterations. The most recent version available is BMP5. It is not a legally binding document, but a set of industry best practices developed by the shipping community aiming to assist ships in mitigating the risk of piracy attacks and ensuring the safety of crew and vessels transiting through high-risk areas. It includes recommendations for vessel hardening measures, such as installing physical barriers and enhancing lighting, as well as ensuring the crew is trained and prepared to respond to potential piracy incidents. It

recommends maintaining effective communication, conducting regular piracy drills and exercises, and utilizing onboard security measures and gives advice on responding to a piracy incident, including distress signaling, activating the vessel's Emergency Contingency Plan, and reporting incidents to the appropriate authorities. Furthermore, BMP5 provides guidance on post-incident procedures, such as medical support for crew members, debriefing, collecting evidence, and reporting the incident to the appropriate organizations.

3.6.4 However, each situation is unique, and the specific security measures may vary depending on the vessel's size, trade route, and operational constraints. This may also include the use of armed guards on board MPCC vessels in accordance with the rules and regulations of the relevant countries and regions the vessel is operating in.

These regulations regarding the use of armed guards on board vessels vary from country to country and therefore it is crucial to familiarize oneself with the specific legislation of each country the vessel will be transiting through or calling at. Often the regulations include guidelines requiring licensing requirements for the security personnel, adhering to specific rules of engagement, ensuring that the armed guards are trained, certified, and equipped appropriately, and/or imposing restrictions on the types of weapons and ammunition that can be carried. And in countries that allow armed guards, obtaining proper permissions and notifying the relevant authorities is typically required. This may involve submitting documentation, providing information about the armed guards, and following specific procedures outlined by the respective country's maritime authorities.

While some nations allow the use of armed guards under certain conditions, others strictly prohibit their presence. Many countries prohibit or restrict the use of armed guards within their territorial waters and vessels transiting through or approaching these waters should comply with the regulations of the coastal state. And most ports and harbors have their own security regulations, which often prohibit or restrict the presence of armed guards on vessels within their jurisdiction. Furthermore, some countries may have regulations that restrict or prohibit the use of armed guards within their Exclusive Economic Zones, which are areas beyond a country's territorial waters where it has special rights and jurisdiction over natural resources.

3.6.4 The above security measures are usually initiated by the technical managers of our vessels, and we have neither doubt nor an indication that this is done in accordance with the above principles. Nevertheless, we plan to establish an annually review of the technical managers' respective procedures as from 2023.

#### **4. TRACKING IMPLEMENTATION AND RESULTS**

We will track the results of the planned measures as per Section 3 above and publish them in our Norwegian Transparency Act Statement 2024.

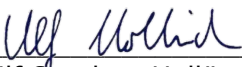
## 5. GRIEVANCE MECHANISMS AND REMEDIATION

MPCC is committed to conducting business with the highest ethical standards and according to applicable laws, rules, and regulations in all its activities. All employees and business partners are encouraged to report any violations of the Code of Conduct, other policies or any suspected fraudulent or unethical behavior by MPCC or its employees, to the below stated contact or through our whistleblower hotline under <https://mpcc.integrityline.com>.

Neither in the year 2022 nor in 2023 up to the date of this statement there were any reported cases relating to Human Rights.

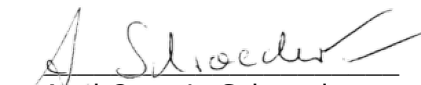
Should MPCC identify in future that by a fraudulent, inappropriate, dishonest, illegal, or negligent activity or behavior it has caused or contributed to adverse impacts, it will provide for or cooperate in the remediation of these adverse impacts. The type of appropriate remedy will depend on the nature and extent of the adverse impact, and may include apologies, restitution, or rehabilitation, financial or non-financial compensation, punitive sanctions, and measures to prevent future adverse impacts.

If you would like more information about MPC Container Ship ASA's work with the Norwegian Transparency Act, please contact Mr. Magnus Granerød via e-mail to [m.granerod@mpc-container.com](mailto:m.granerod@mpc-container.com) or by phone at +47 922 38 407.

  
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Chairman of the Board

  
Ellen Merethe Hanetho  
Board member

  
Pia Meling  
Board member

  
Axel Octavio Schroeder  
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