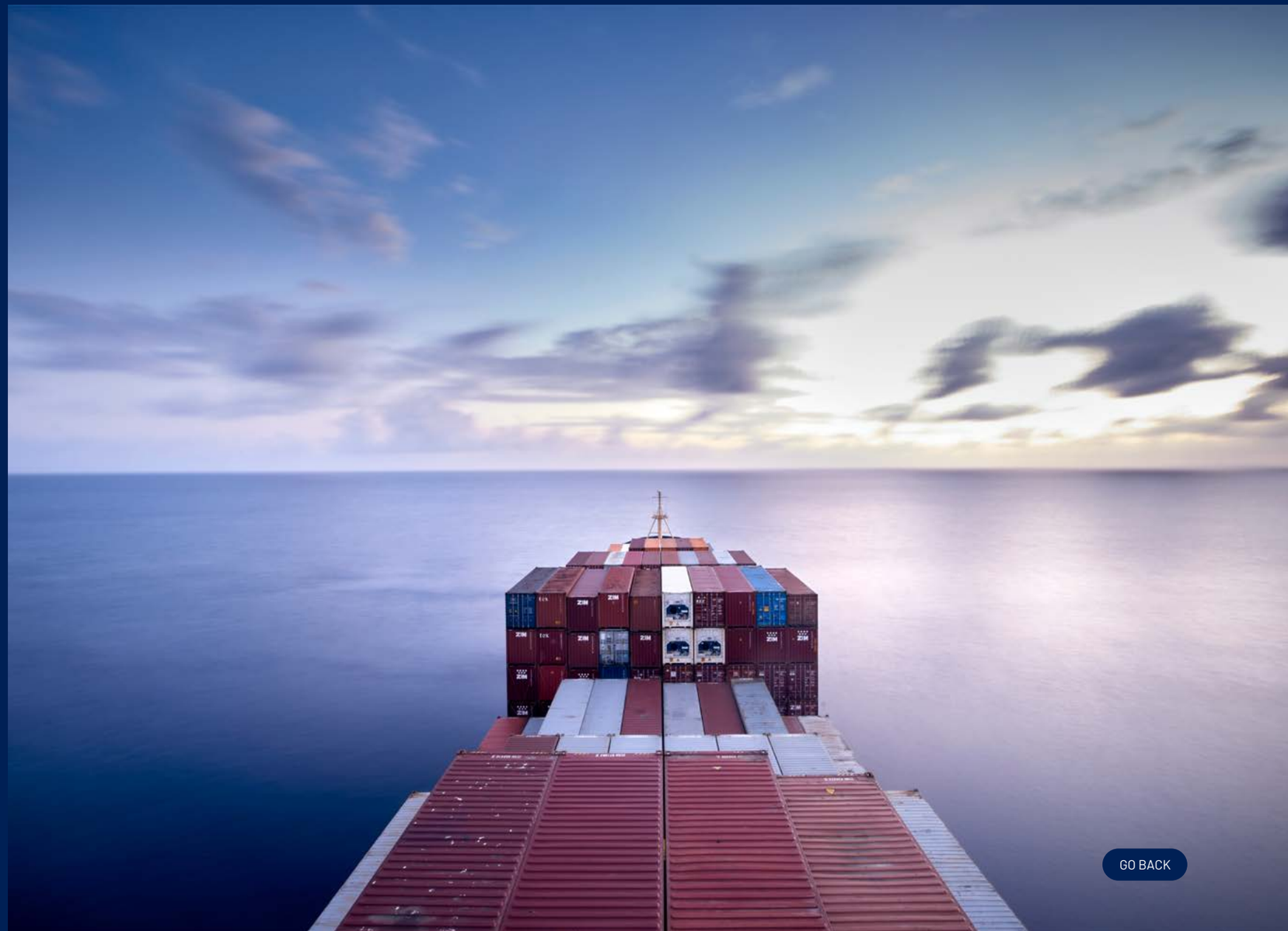
# SUSTAINABILITY STATEMENT





# OPERATIONAL HIGHLIGHTS 2024

## Environmental

+ Reduction of 10.98% total energy consumption
+ Reduction of fleet average well-to-wake GHG emissions intensity of 3.82%
+ Reduction of Scope 1 GHG emissions by 11.29%
+ Reduction of Sulphur oxide air pollution by 12.84%
+ Reduction of Nitrous oxide air pollution by 15.17%
+ Reduction of Particulate Matter air pollution by 12.94%

## Social

+ Implementation of Star Link for continuous internet access on board
+ Crew Wellbeing study (Promoting Healthier Lifestyle, "Anti-Harassment" Campaign and "Sports-on-Board" Campaign)
+ Number of People in distress supported by MPCC during Search & Rescue Operation: 52
+ Average Lost Time Incident Rate: 0.36

## Governance

+ Sustainability Report in line with the requirements of the CSRD and ESRS to prepare MPCC for future compliance
+ ESG-KPI implemented in C-Suite incentive scheme
+ Sustainability Linked Bond issued in 2024

# CEO LETTER

**Constantin Baack**
CEO

**Moritz Fuhrmann**
Co-CEO and CFO

**Our commitment to sustainability is imperative for sustained success in a rapidly evolving industry.**

The geopolitical tensions, particularly the Red Sea crisis, continued to impact 2024, posing significant challenges to international shipping. Extensive rerouting of vessels around the Cape of Good Hope affected freight rates and operational logistics, underscoring the resilience required in our industry. At MPCC, we understand the importance of integrating Environmental, Social and Governance (ESG) considerations into our strategic objectives. Our commitment to sustainability is crucial for long-term value creation. As we navigate market dynamics and challenges, our ESG efforts guide our decisions and investments to maximize shareholder returns while mitigating risks.

## Driving Sustainable Growth: Fleet Renewal and Emission Reduction Investments

One of our primary environmental objectives is the reduction of our greenhouse gas (GHG) emissions intensity in alignment with the International Maritime Organization's (IMO) trajectory and during the year we strengthened the 2030 fleet average GHG Intensity Target.

To achieve our emission targets, we have committed to substantial fleet renewal and optimization investments and have increased our total commitment to USD 600m, which is almost fully invested. This includes dual-fuel and eco-design newbuildings, secondhand eco-vessel acquisitions, and joint retrofit investments with our charter customers. During the year, we welcomed six eco-design vessels into our fleet. In January 2025 the first of three dual-fuel methanol vessels from our newbuilding program were delivered.

These vessels are integral to our fleet renewal and emissions reduction strategy. Additionally, we continued to invest and progress in our retrofit program to continuously enhance our fleet and align with our commitment to sustainable shipping solutions.

The shipping industry is increasingly focusing on sustainability to reduce environmental impact, comply with stricter regulations, meet customer demand for greener practices, and enhance long-term operational efficiency. Expectations in the industry point to a multi-fuel future and by incorporating environmentally sustainable technologies, we are strategically positioning MPCC to invest in and capitalize on the transition towards greener shipping practices, further enhancing long-term shareholder value.

Our ESG efforts are not only about mitigating risks but also about seizing opportunities to create long-term value for our shareholders. Through strategic partnerships and the fleet renewal investments, we aim to drive sustainable growth while maintaining a low-to-moderate leverage structure and high balance sheet flexibility that increases shareholder value and allows for capital allocation aligned with ESG principles.

## Dedicated to Our People: Socially Responsible Initiatives

We are dedicated to protecting and improving the safety and well-being of our employees onshore and the crew aboard our vessels. By fostering a supportive work environment and investing in safety culture, we aim to mitigate risks and ensure the welfare of all individuals involved in our operations.

Especially with the ongoing geopolitical uncertainties, we must be vigilant and take into consideration all possible effects, particularly when it comes to the impact to our vessels and crew. We continue to avoid transit through the Red Sea, placing our crews' safety above all else.

Over the past year, we have made significant strides in enhancing crew well-being. We conducted a comprehensive survey, leading to several initiatives: cooks received nutrition training, we are launching the Fleet Fitness Challenge, we partnered with a company offering online courses to help crew members quit smoking and are exploring ways to reduce stress through increased flexibility. Additionally, we rolled out Starlink on all vessels, providing better internet connectivity and communication with the rest of the world. These efforts aim to create a healthier, more supportive environment for our crew.

## Navigating Regulatory Changes with Transparency and Accountability

Both as a shipping company and as a publicly listed entity we face a rapidly evolving industry- and regulatory landscape, and our sustainability efforts are not confined to environmental initiatives alone. Governance forms the foundation of our ethical and responsible business approach, and we strive to operate with transparency, integrity, and accountability at every level of our organization.

Operationally, we are well-prepared for new regulatory developments. Even though MPCC is not required to submit mandatory reports under the Corporate Sustainability Reporting Directive (CSRD) for the fiscal year 2024, we are committed to voluntary reporting this year. This decision underscores our dedication to transparency and accountability in our sustainability practices, reflecting our proactive approach to environmental and social responsibility. During the year we also expanded our team with a Group Sustainability Officer to strengthen MPCC's sustainability capacities.

## Driving Sustainable Operations for the Future

In 2024, we completed a USD 125 million sustainability-linked bond and an ECA-covered green loan. Our commitment to ESG and sustainability drives our vision for sustainable container shipping and to contribute to driving sustainable change in the maritime industry, we have developed comprehensive Sustainability-Linked and Green Financing Framework. These frameworks align with our core values of environmental responsibility and long-term resilience. By leveraging sustainable financing, we support eco-friendly innovations, enhance operational efficiency, and advance fleet decarbonization, ultimately contributing to a more sustainable maritime sector.

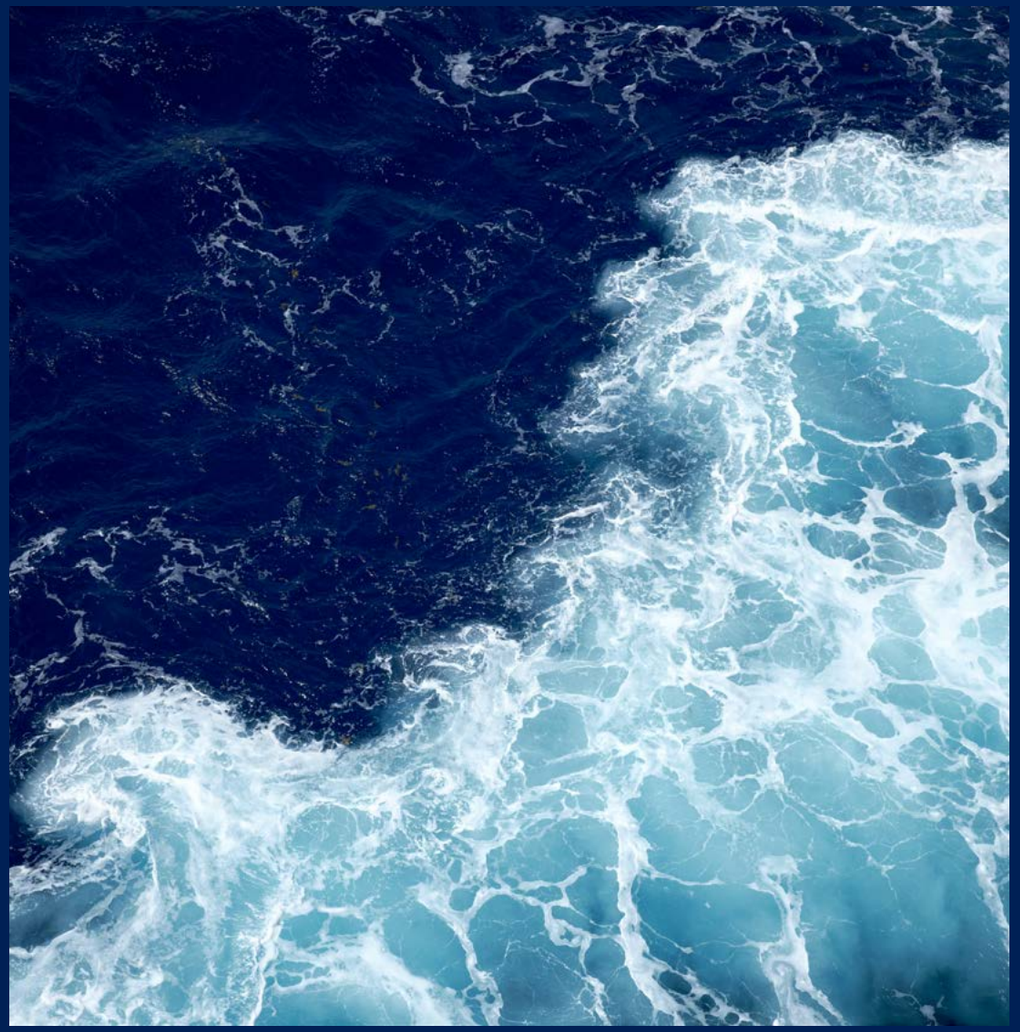
In closing, our commitment to ESG principles is not just a reflection of our values; it is a strategic imperative for sustained success in a rapidly evolving industry. As we continue to navigate the evolving industry, facing both challenges and opportunities on the horizon, we are optimistic about the journey ahead. We would like to thank our dedicated and hard-working colleagues, seafarers, and partners for their continued support and contributions to these important efforts.

We hope this report provides insight into our ongoing commitment to sustainability and invite you to engage with us further. Your interest and feedback are invaluable as we continue to drive positive change in the shipping industry.

Sincerely,

Constantin Baack
CEO
MPC Container Ships ASA

Moritz Fuhrmann
Co-CEO and CFO
MPC Container Ships ASA



# GENERAL INFORMATION

# ESRS 2 GENERAL DISCLOSURES

## BASIS FOR PREPARATION

### BP-1 – General basis for preparation of the sustainability statement

MPC Container Ships ASA's (hereafter referred to as "MPC Container Ships", "MPCC" or "the Company") sustainability statement has been prepared on an individual basis, separated from the Company's 2024 financial statements.

MPCC's consolidated financial statements include MPC Container Ships ASA as the parent company and all its subsidiaries. For a full list of companies that constitute the Group, refer to Note 6.2 in the Annual Report.

For the purposes of this sustainability statement, the term "MPCC Group" shall not imply full operational control or accountability over non-consolidated entities.

The sustainability statement covers material impacts, risks and opportunities (IROs) in MPCC's own operations, as well as its upstream and downstream value chain, as identified in the double materiality assessment (DMA). The full extent of the assessment boundaries is outlined on page 118, section SBM-3 of this report.

No information corresponding to intellectual property, know-how or the results of innovation has been omitted from the report. MPCC does not exempt the disclosure of information pertaining to impending developments or matters in the course of negotiations.

### BP-2 – Disclosures in relation to specific circumstances

Although MPCC is not subject to mandatory reporting under the Corporate Sustainability Reporting Directive (CSRD) directive for FY 2024, this sustainability statement has been prepared following the principles and disclosure requirements of the European Sustainability Reporting Standards (ESRS) under the directive. MPCC are awaiting the outcome of the political discussions in the EU regarding the EU Commission's "Omnibus" proposal to amend the CSRD. If the proposal is transposed into national law in Norway, MPCC could be out of scope of the CSRD and might not be obliged to report according to ESRS. Prior to this, the Company's sustainability report was structured in line with the Global Reporting Initiative (GRI) and Sustainability Accounting Standards Board (SASB) frameworks.

In line with this transition, MPCC has revised and strengthened its greenhouse gas (GHG) intensity target for 2030. As outlined in E1-4, the Company has set an ambitious goal to achieve a 45% reduction in well-to-wake GHG emissions intensity from a 2008 baseline. The Company has also made a clear commitment to reaching net

zero emissions by 2050, in alignment with the 2023 IMO Strategy on Reduction of GHG Emissions from Ships and thereby the 1.5°C trajectory.

### Disclosures stemming from other legislation or other sustainability reporting standards

This statement has been developed on a voluntary basis in preparation for compliance with the CSRD and ESRS; however, it has not been subject to limited assurance by our external auditor. It includes all material disclosures, while disclosures deemed immaterial through the double materiality assessment have been omitted. The full list of disclosures omitted from this report is provided in IRO-1.

### Incorporation by reference

MPCC has applied incorporation by reference to address the following disclosure requirements and data points.

| DISCLOSURE REQUIREMENT | DATAPOINT | LOCATION IN MANAGEMENT REPORT |
|---|---|---|
| ESRS 2 GOV-4 | 30; 32 Mapping of information provided in sustainability statement about the due diligence process | Appendix, page 124 |

The report integrates disclosures from the Norwegian Transparency Act and the Norwegian Accounting Act, as well as key elements from other sustainability frameworks. These include the Sustainability Accounting Standards Board (SASB) Maritime Transportation Standard (2023) and the Global Reporting Initiative (GRI) standards (see ESRS 2 Accounting policies for a full overview).

### Use of phase-in provisions

As MPCC has fewer than 750 employees, the Company has opted to exercise the phase-in provision to omit ESRS topical standards related to ESRS E4 – "Biodiversity and ecosystems" and S3 – "Affected communities", along with certain datapoints under S1 – "Own workforce" and S2 – "Workers in the value chain", in accordance with Appendix C of ESRS 1.

## E4 – Biodiversity and ecosystems

Although the materiality assessment identified biofouling (the accumulation of marine organisms on the surfaces of MPCC vessels) and ballast water and GHG emissions (E4) as material impacts within its operations, the shipping industry operates under a robust international regulatory framework managing these impacts.

MPCC complies with international standards, such as the IMO Ballast Water Management Convention and MARPOL Annexes, which enforce strict protocols on ballast water treatment. The 2023 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (Biofouling Guidelines) provide an international consistent approach to the management of biofouling, which is the accumulation of various aquatic organisms on ships' hulls. By ballast water management, biofouling control, and pollution prevention, the Company ensures that biodiversity-related impacts are managed in accordance with best practices and international regulations.

Aside from adherence to these regulations, as mandated by Company's Environmental Policy, MPCC has invested in advanced pollution control technologies, decarbonization strategies, and stakeholder collaboration to enhance sustainable practices across its value chain. Together, these efforts reflect the Company's commitment to mitigating biodiversity impacts across its operations and value chain.

MPCC has not yet formalized time-bound targets or metrics related to these matters.

## S1 – Own workforce

Employee stress, retention and safety were assessed as material impacts under the materiality assessment, and impacts are mitigated through a robust human capital management framework, implemented via the Company's Human Capital Policy, Health and Safety Policy and Human Rights Policy (see S1-1 for a description of these policies). These company policies emphasize employee well-being, fair treatment, and safety.

Initiatives such as regular engagement surveys, targeted stress-reduction programs, and professional development opportunities ensure that workforce impacts are managed effectively. Additionally, MPCC has established a target to maintain an onshore employee retention rate above 90%. Metrics, including retention rates and employee engagement, are monitored annually to support these efforts.

## S2 – Workers in the value chain

MPCC recognizes its responsibility towards crew workers, ship recycling workers and other supply chain workers. Consequently, impacts related to the health, safety and working conditions of these workers are deemed material. These impacts are thoroughly

addressed through the Company's Human Rights Policy, Health & Safety Policy, Ship Recycling Policy, and Business Partner Guideline.

Offshore workers are protected by international labor standards such as the Maritime Labor Convention (MLC), which ensures fair working conditions, safety, and well-being. Initiatives like enhanced onboard internet access (via Starlink) and targeted welfare programs support mental health and stress reduction. For ship recycling workers, MPCC enforces compliance with the EU Ship Recycling Regulation (for newbuilds) and IMO's Hong Kong Convention, ensuring safe, ethical, and environmentally sound practices.

MPCC has set a target to maintain a Lost Time Injury Rate (LTIR) below 0.3 by 2030, with progress monitored through safety audits, training programs, and incident reporting. The Company collaborates with partners to uphold ethical treatment of value chain workers and maintain workplace standards.

### Entity-specific disclosures – Search and Resue

MPCC acknowledges its legal and humanitarian responsibilities in Search and Rescue (SAR) operations and complies with the Safety of Life at Sea (SOLAS) Convention. The Company identifies three key material impacts related to SAR: saving lives at sea, managing crew safety risks, and upholding the principle of non-refoulement.

To address these challenges, MPCC integrates SAR commitments into its Health & Safety, Human Rights, and Human Capital Policies, aligning with international safety and labor standards. Although there is currently no standalone SAR policy, MPCC plans to enhance its guidance as part of the transition plan by 2025 to formalize its approach. In the meantime, SAR-related responsibilities are overseen by technical managers, who ensure regulatory compliance and risk mitigation while maintaining safe and effective rescue operations.

To manage the risks associated with SAR, MPCC focuses on crew safety and operational readiness. Rescue operations can place seafarers in high-stress situations, as vessels may take on large groups of distressed individuals, sometimes leading to conflict and security concerns. To address this, MPCC implements continuous mitigation measures, including specialized crew training in crisis management, and emergency response according to SOLAS and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW). SAR operations comply with safety and regulatory frameworks and incorporate quality and environmental management standards. These efforts are crucial to safeguarding both the rescued individuals and the crew, ensuring a controlled and secure response in high-risk maritime areas.

# APPENDIX

## IRO-2 List of datapoints that derive from other EU legislation

This table provides an assessment of materiality of datapoints in ESRS that stem from other regulations, as well as a mapping of the material datapoints to chapters in the statement. Datapoints that are deferred due to the phase-in requirements, especially given the fact that MPCC has below 750 employees, have been indicated as not material.

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS 2 GOV-1** Board's gender diversity paragraph 21 (d) | Indicator number 13 of Table #1 of Annex 1 | | Commission Delegated Regulation (EU) 2020/1816 ( 27 ) , Annex II | | Material | Governance structure | 122 |
| **ESRS 2 GOV-1** Percentage of board members who are independent paragraph 21 (e) | | | Delegated Regulation (EU) 2020/1816, Annex II | | Material | Governance structure | 122 |
| **ESRS 2 GOV-4** Statement on due diligence paragraph 30 | Indicator number 10 Table #3 of Annex 1 | | | | Material | Statement on due diligence | 124 |
| **ESRS 2 SBM-1** Involvement in activities related to fossil fuel activities paragraph 40 (d) I | Indicators number 4 Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ( 28 ) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |
| **ESRS 2 SBM-1** Involvement in activities related to chemical production paragraph 40 (d) ii | Indicator number 9 Table #2 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |
| **ESRS 2 SBM-1** Involvement in activities related to controversial weapons paragraph 40 (d) iii | Indicator number 14 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1818 ( 29 ) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |
| **ESRS 2 SBM-1** Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv | | | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS E1-1** Transition plan to reach climate neutrality by 2050 paragraph 14 | | | | Regulation (EU) 2021/1119, Article 2(1) | Material | Transition Plan | 140 |
| **ESRS E1-1** Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g) | | Article 449a<br>Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2 | | Not material | | |
| **ESRS E1-4** GHG emission reduction targets paragraph 34 | Indicator number 4 Table #2 of Annex 1 | Article 449a<br>Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | Material | Targets (E1) | 146 |
| **ESRS E1-5** Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38 | Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1 | | | | Material | Metrics (E1) | 147 |
| **ESRS E1-5** Energy consumption and mix paragraph 37 | Indicator number 5 Table #1 of Annex 1 | | | | Material | Metrics (E1) | 147 |
| **ESRS E1-5** Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43 | Indicator number 6 Table #1 of Annex 1 | | | | Material | Metrics (E1) | 147 |
| **ESRS E1-6** Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44 | Indicators number 1 and 2 Table #1 of Annex 1 | Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1) | | Material | Metrics (E1) | 148 |

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS E1-6** Gross GHG emissions intensity paragraphs 53 to 55 | Indicators number 3 Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 8(1) | | Material | Metrics (E1) | 148 |
| **ESRS E1-7** GHG removals and carbon credits paragraph 56 | | | | Regulation (EU) 2021/1119, Article 2(1) | Not material | | |
| **ESRS E1-9** Exposure of the benchmark portfolio to climate-related physical risks paragraph 66 | | | Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |
| **ESRS E1-9** Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) **ESRS E1-9** Location of significant assets at material physical risk paragraph 66 (c). | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk. | | | Not material | | |
| **ESRS E1-9** Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c). | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralized by immovable property – Energy efficiency of the collateral | | | Not material | | |
| **ESRS E1-9** Degree of exposure of the portfolio to climate-related opportunities paragraph 69 | | | Delegated Regulation (EU) 2020/1818, Annex II | | Not material | | |
| **ESRS E2-4** Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28 | Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1 | | | | Material | Metrics (E2) | 155 |
| **ESRS E3-1** Water and marine resources paragraph 9 | Indicator number 7 Table #2 of Annex 1 | | | | Not material | | |

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS E3-1**<br>Dedicated policy paragraph 13 | Indicator number 8 Table 2 of Annex 1 | | | | Not material | | |
| **ESRS E3-1**<br>Sustainable oceans and seas paragraph 14 | Indicator number 12 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS E3-4**<br>Total water recycled and reused paragraph 28 (c) | Indicator number 6.2 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS E3-4**<br>Total water consumption in m 3 per net revenue on own operations paragraph 29 | Indicator number 6.1 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS 2- SBM 3 – E4**<br>paragraph 16 (a) i | Indicator number 7 Table #1 of Annex 1 | | | | Not material | | |
| **ESRS 2- SBM 3 – E4**<br>paragraph 16 (b) | Indicator number 10 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS 2- SBM 3 – E4**<br>paragraph 16 (c) | Indicator number 14 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS E4-2**<br>Sustainable land / agriculture practices or policies paragraph 24 (b) | Indicator number 11 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS E4-2**<br>Sustainable oceans / seas practices or policies paragraph 24 (c) | Indicator number 12 Table #2 of Annex 1 | | | | Material | Policies (E4) | 160 |
| **ESRS E4-2**<br>Policies to address deforestation paragraph 24 (d) | Indicator number 15 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS E5-5**<br>Non-recycled waste paragraph 37 (d) | Indicator number 13 Table #2 of Annex 1 | | | | Not material | | |
| **ESRS E5-5**<br>Hazardous waste and radioactive waste paragraph 39 | Indicator number 9 Table #1 of Annex 1 | | | | Not material | | |
| **ESRS 2- SBM3 – S1**<br>Risk of incidents of forced labor paragraph 14 (f) | Indicator number 13 Table #3 of Annex I | | | | Not material | | |

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS 2- SBM3 – S1**<br>Risk of incidents of child labor paragraph 14 (g) | Indicator number 12 Table #3 of Annex I | | | | Not material | | |
| **ESRS S1-1**<br>Human rights policy commitments paragraph 20 | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I | | | | Material | Policies (S1) | 170 |
| **ESRS S1-1**<br>Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21 | | | Delegated Regulation (EU) 2020/1816, Annex II | | Material | Policies (S1) | 170 |
| **ESRS S1-1**<br>processes and measures for preventing trafficking in human beings paragraph 22 | Indicator number 11 Table #3 of Annex I | | | | Material | Policies (S1) | 170 |
| **ESRS S1-1**<br>workplace accident prevention policy or management system paragraph 23 | Indicator number 1 Table #3 of Annex I | | | | Material | Policies (S1) | 170 |
| **ESRS S1-3**<br>grievance/complaints handling mechanisms paragraph 32 (c) | Indicator number 5 Table #3 of Annex I | | | | Not material | | |
| **ESRS S1-14**<br>Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c) | Indicator number 2 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |
| **ESRS S1-14**<br>Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e) | Indicator number 3 Table #3 of Annex I | | | | Not material | | |
| **ESRS S1-16**<br>Unadjusted gender pay gap paragraph 97 (a) | Indicator number 12 Table #1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | Not material | | |
| **ESRS S1-16**<br>Excessive CEO pay ratio paragraph 97 (b) | Indicator number 8 Table #3 of Annex I | | | | Not material | | |
| **ESRS S1-17**<br>Incidents of discrimination paragraph 103 (a) | Indicator number 7 Table #3 of Annex I | | | | Not material | | |

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS S1-17**<br>Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a) | Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818 Art 12 (1) | | Not material | | |
| **ESRS 2- SBM3 – S2**<br>Significant risk of child labor or forced labor in the value chain paragraph 11 (b) | Indicators number 12 and n. 13 Table #3 of Annex I | | | | Material | Material impacts, risks and opportunities (S2) | 177 |
| **ESRS S2-1**<br>Human rights policy commitments paragraph 17 | Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1 | | | | Material | Policies (S2) | 178 |
| **ESRS S2-1**<br>Policies related to value chain workers paragraph 18 | Indicator number 11 and n. 4 Table #3 of Annex 1 | | | | Material | Policies (S2) | 178 |
| **ESRS S2-1**<br>Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19 | Indicator number 10 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Material | Policies (S2) | 178 |
| **ESRS S2-1**<br>Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 19 | | | Delegated Regulation (EU) 2020/1816, Annex II | | Material | Policies (S2) | 178 |
| **ESRS S2-4**<br>Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36 | Indicator number 14 Table #3 of Annex 1 | | | | Not material | | |
| **ESRS S3-1**<br>Human rights policy commitments paragraph 16 | Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1 | | | | Not material | | |
| **ESRS S3-1**<br>non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17 | Indicator number 10 Table #1 Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material | | |
| **ESRS S3-4**<br>Human rights issues and incidents paragraph 36 | Indicator number 14 Table #3 of Annex 1 | | | | Not material | | |

| DISCLOSURE REQUIREMENT AND RELATED DATAPOINT | SFDR REFERENCE | PILLAR 3 REFERENCE | BENCHMARK REGULATION REFERENCE | EU CLIMATE LAW REFERENCE | MATERIAL/NOT MATERIAL | CHAPTER | PAGE |
|---|---|---|---|---|---|---|---|
| **ESRS S4-1** Policies related to consumers and end-users paragraph 16 | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1 | | | | Not material | | |
| **ESRS S4-1** Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17 | Indicator number 10 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material | | |
| **ESRS S4-4** Human rights issues and incidents paragraph 35 | Indicator number 14 Table #3 of Annex 1 | | | | Not material | | |
| **ESRS G1-1** United Nations Convention against Corruption paragraph 10 (b) | Indicator number 15 Table #3 of Annex 1 | | | | Not material | | |
| **ESRS G1-1** Protection of whistle- blowers paragraph 10 (d) | Indicator number 6 Table #3 of Annex 1 | | | | Material | Policies (G1) | 192 |
| **ESRS G1-4** Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a) | Indicator number 17 Table #3 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II) | | Material | Incidents of corruption and bribery | 196 |
| **ESRS G1-4** Standards of anti- corruption and anti- bribery paragraph 24 (b) | Indicator number 16 Table #3 of Annex 1 | | | | Not material | | |

## IRO-2 Disclosures requirements covered in MPCC's sustainability statement

The following table shows all disclosure requirements complied with in MPCC's sustainability statement. Since MPCC has less than 750 employees, information regarding E4 – Biodiversity and ecosystems, S1 – Own workforce and S2 – Workers in the value chain is covered by Disclosure requirement BP-2 rather than by the relevant disclosure requirements under each topical standard.

| LIST OF MATERIAL DISCLOSURE REQUIREMENTS | PARAGRAPH (PAGE NUMBERS) |
|---|---|
| **BP-1** | General basis for preparation of the sustainability statement |
| **BP-2** | Disclosures in relation to specific circumstances |
| | Entire E4 – "Biodiversity and ecosystems" chapter |
| | Entire S1 - "Own Workforce" chapter |
| | Entire S2 – "Workers in the value chain" chapter |
| **GOV-1** | The role of the administrative, management and supervisory bodies |
| **GOV-2** | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies |
| **GOV-3** | Integration of sustainability-related performance in incentive schemes |
| **GOV-4** | Statement on Due Diligence |
| **GOV-5** | Risk management and internal control |
| **SBM-1** | Strategy and business model |
| **SBM-2** | Interests and views of stakeholders |
| **SBM-3** | Material impacts, risks and opportunities and their interaction with strategy and business model |
| | Material impacts, risks and opportunities (E1 – "Climate change", E2 – "Pollution", E4 – "Biodiversity and ecosytstems", E5 – "Resource use and circular economy", S1 – "Own workforce", S2 – "Workers in the value chain", G1 – "Business conduct") |
| **IRO-1** | Description of processes to identify and assess material impacts, risks and opportunities |
| **IRO-2** | Appendix |

| LIST OF MATERIAL DISCLOSURE REQUIREMENTS | PARAGRAPH (PAGE NUMBERS) |
|---|---|
| **MDR-P** | Policies related to climate change mitigation and adaptation |
| | Policies related to pollution |
| | Policies related to biodiversity and ecosystems |
| | Policies related to resource use and circular economy |
| | Policies (S1 – "Own workforce", S2 – "Workers in the value chain", G1 – "Business conduct") |
| **MDR-A** | Actions related to climate change mitigation and adaptation |
| | Actions and resources related to pollution |
| | Actions and resources related to biodiversity and ecosystems |
| | Actions related to resource use and circular economy |
| | Actions (S1 – "Own workforce", S2 – "Workers in the value chain") |
| **MDR-T** | Targets related to climate change mitigation and adaptation |
| | Targets related to pollution |
| | Targets related to biodiversity and ecosystems |
| | Targets (S1 – "Own workforce", S2 – "Workers in the value chain") |

| LIST OF MATERIAL DISCLOSURE REQUIREMENTS | PARAGRAPH (PAGE NUMBERS) |
|---|---|
| **E1-1** | Transition Plan for climate change mitigation |
| **E1-2** | Policies related to climate change mitigation and adaptation |
| **E1-3** | Actions related to climate change mitigation and adaptation |
| **E1-4** | Targets related to climate change mitigation and adaptation |
| **E1-5** | Energy Consumption and mix |
| **E1-6** | Gross Scopes 1, 2 and 3 and Total GHG emissions |
| **E2-1** | Policies related to pollution |
| **E2-2** | Actions and resources related to pollution |
| **E2-3** | Targets related to pollution |
| **E2-4** | Pollution of air, water and soil |
| **E2-5** | Substances of concern and substances of very high concern |
| **E2-6** | Anticipated financial effects from pollution-related IROs |
| **G1-1** | Business conduct policies<br>Approach to corporate culture |
| **G1-2** | Approach to relationship with suppliers |
| **G1-3** | Prevention and detection of corruption and bribery |
| **G1-4** | Incidents of corruption and bribery |
| **G1-6** | Payment practices |

## MEMBERSHIPS & INITIATIVES

MPCC is committed to engaging, either directly or through third-party ship managers, in partnerships that support its objectives related to Environmental, Social, and Governance (ESG) standards. These partnerships include the following:

### Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping (MMMCZCS)

MPCC serves as a mission ambassador and project partner to MMMCZCS, an independent research and development think-tank dedicated to expediting the transition towards a net-zero future for the industry. The seconded employees are actively involved in key industry transition strategy projects, such as the development of "Katalyst," a non-profit 'book and claim' registry aimed at accelerating the decarbonization of the shipping industry, the establishment of Green Shipping Corridors, and the Revision of the IMO's Carbon Intensity Indicator (CII). MPCC, along with its partner companies at MPC Group, remains committed to supporting the Center by leveraging its extensive network and expertise in commercial and technical management, renewable energy, and synthetic fuels to facilitate the necessary transition within the maritime industry.

### Clean Shipping Alliance

MPC Container Ships ASA is a member of the Clean Shipping Alliance (CSA), an industry association committed to advancing sustainable and responsible shipping practices. The CSA provides a platform for research, collaboration, and regulatory engagement, particularly in the area of emissions reduction technologies based on Exhaust Gas Cleaning Systems, Selective Catalytic Reduction and Carbon Capture Systems. By participating in the alliance, MPC Container Ships contributes to industry-wide efforts to improve environmental performance, ensure compliance with international regulations, and promote solutions that support the transition to a lower-emission maritime sector.

### VDR German Shipowners' Association

The German Shipowners' Association (Verband Deutscher Reeder, VDR) is the leading industry organization representing the interests of German shipping companies at the national, European, and international levels. As the voice of the German maritime sector, the VDR engages in policy advocacy, regulatory discussions, and industry initiatives to support the competitiveness and sustainability of Germany's shipping industry. The association works closely with government authorities, international organizations, and other stakeholders to shape maritime policy, promote innovation, and address key challenges such as decarbonization, digitalization, and the future of maritime labor.

MPC Container Ships ASA, as a member of the VDR, actively contributes to discussions on regulatory developments and industry best practices, ensuring alignment with evolving environmental and operational standards. Executives of MPCC and its partner companies are represented in the Board of Directors and Committees.

## Eyesea

MPCC and its CEO are founding members and ambassadors of Eyesea, a non-profit organization set up to map and report global pollution and maritime hazards. Using a global network of seafarers, maritime professionals, and volunteers, Eyesea gathers visual pollution data via a mobile app, helping to identify, track, and address ocean waste and environmental hazards.

In 2024, the Eyesea Initiative expanded its global impact on marine pollution monitoring and cleanup through key partnerships and technological advancements. Notable developments include:

+ Certification Standards: Collaboration with Normec Verifavia to explore certification for ocean pollution mapping.
+ Global Partnerships: Agreements with Rapa Nui municipal authorities and Galápagos conservation groups to enhance pollution tracking.
+ Innovative Responses: Partnerships with SurfCleaner for nearshore oil spill mitigation and Aurora Expeditions for pollution monitoring in Antarctica.
+ Community Engagement: Beach cleanups in India and expanded local involvement in pollution reporting.

These initiatives reinforce and align with MPC Container Ships' commitment to ecological health and sustainable maritime practices.

## Maritime Anti-Corruption Network

MPCC is a member of the Marine Anti-Corruption Network (MACN) – a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

## The Container Ship Safety Forum (CSSF)

CSSF is a global business-to-business network that improves safety performance and management practices in the container shipping industry. MPCC's technical manager, WASM, is a CSSF member

and works together with other industry actors to continuously improve the safety culture and performance in the container shipping industry through measurement, reporting and benchmarking, sharing best practices and engaging with key stakeholders which is crucial for MPCC´s value-chain Health and Safety commitment.

## The Silk Alliance

The Silk Alliance is an industry collaboration led by the Lloyd's Register Maritime Decarbonization Hub, aiming to accelerate the transition to zero-emission shipping in Asia. The alliance brings together key stakeholders across the maritime value chain—including shipowners, fuel suppliers, ports, and regulators—to develop scalable and commercially viable green shipping corridors.

By participating in the Silk Alliance, MPC Container Ships ASA contributes to the development of infrastructure, fuel supply networks, and regulatory frameworks necessary to support the decarbonization of regional and global shipping operations

# Strategy, Business Model and Value Chain

## SBM-1 – Strategy & business model

### About MPCC

MPC Container Ships is a leading global feeder container tonnage provider, headquartered in Oslo, Norway. Since its inception in April 2017, MPCC has undergone rapid growth to become one of the world's leading feeder container tonnage providers, focusing its operations on intra-regional trade lines that connect major ports with smaller, regional ones. MPCC´s vessels are chartered out to global liner shipping companies and regional carriers.

MPCC employs a diverse team of around 40 industry professionals across key operational functions. MPCC's value chain comprises around 1,400 seafarers serving aboard MPCC´s vessels, which make its operations possible enabling the seamless transportation of goods across the globe. While MPCC subcontracts commercial and technical ship management and crewing services to third-party providers, the Company maintains rigorous oversight and accountability for their performance.

Operations extend across three key locations: Oslo, Norway; Hamburg, Germany; and Rhoon, the Netherlands. These strategically positioned offices support its commitment to delivering exceptional services to its global customers.

## Strategy, main challenges and critical solutions

### Tackling the environmental challenges of the shipping industry

One of the core challenges for the shipping industry is the pressure to decarbonize, as it is a hard-to-abate sector requiring drastic reductions in GHG emissions. Regulatory frameworks such as the IMO 2030 Strategy have set ambitious targets, including net-zero emissions of international shipping by 2050 and a 40% decrease in carbon intensity by 2030 compared to 2008 levels.

Likewise, the transition to renewable fuels, such as methanol, is critical to reduce reliance on conventional fossil fuels. However, this energy transition is hindered by high costs, limited supply chain infrastructure, and uncertainties in fuel and energy availability.

Other key challenges for the industry include mitigating air and water pollution, addressing biodiversity impacts, and reducing the resource-intensity of operations. These challenges are further complicated by split incentives for retrofitting between ship owners and charterers and regulatory inconsistencies, necessitating solutions such as cost-sharing models and industry collaborations.

MPCC tackles these challenges by embedding sustainability at the core of its strategy. MPCC is committed to driving progress in key areas, including decarbonization, circularity, pollution management, biodiversity protection. These priorities, described in the Environmental chapters, guide the Company's efforts to create long-term resilience.

### Cultivating a culture of safety and governance

Another key focus area related to the sustainability aspects of its strategy is ensuring human rights as well as health and safety in the maritime industry. This is a critical challenge given the inherent risks associated with offshore operations and ship recycling. One of MPCC's key strategic objectives is to foster workforce well-being and establish a strong safety culture that prioritizes safe practices at sea and across the value chain. Further details on these goals and actions are found in the Social chapters.

## Business model and Value chain

### Significant products and services

MPCC provides feeder container vessels to global liner companies and regional carriers, under Time-Charter Agreements. The vessels are employed in intra-regional trade lanes which are critical in connecting major ports on intercontinental shipping lanes with smaller, regional ports. The vessels are chartered out on Time-Charter Contracts, ensuring stable revenue streams while meeting the diverse needs of a global customer base.

### Significant markets and customer groups

MPCC operates as a leading containership owner specializing in the feeder segment with vessels below 6,000 TEU. The primary focus lies in owning and chartering out a portfolio of container ships,

enabling efficient and reliable transportation for intra-regional trade lanes on Time-Charter Contracts.

The key markets include Asia, South America, Europe, the Middle East, and Africa. These regions are critical for the Company's intra-regional trade services, which connect economies and support supply chains across industries. MPCC serves a diverse customer base, including major global shipping companies such as Maersk A/S and Hapag Lloyd AG, as well as regional carriers.

The forward charter backlog was at USD 1.1bn as per 31.12.24. 74% of the forward charter backlog is again counterparties that are categorized as the top 10 liners (ranking is based on list of 100 largest container/ liner operators by Alphaliner). In total, over 90% of the revenue backlog is with top 10 lines and cargo-backed, with an average contract duration of 2 years.

### Employee groups

The following table summarizes employees per location, excluding interns and externals, and employees on regular leave.

| LOCATION | HEADCOUNT |
|---|---|
| Oslo | 6 |
| Hamburg | 29 |
| Rhoon | 3 |

## Value chain

### Upstream

MPCC's upstream actors comprise raw material suppliers (steel, fuel, plastics), tiered shipbuilders, and crewing agencies. Shipbrokers and commercial management services facilitate vessel chartering and fleet capacity access. These actors are indirectly linked to MPCC through business relationships, which influence operational capabilities and compliance with international standards.

Technical managers provide oversight of vessel maintenance, energy efficiency upgrades, and safety compliance. These functions directly impact MPCC's operational reliability and alignment with sustainability objectives.

### Own operations

The Company's core business involves managing its fleet and providing transportation services via Time-Charter Agreements to global liner shipping companies and regional carriers. Corporate functions, including finance, operations, commercial and technical asset management, investor relations as well as general- and sustainability management, support operational effectiveness of the Company. MPCC maintains full control over these functions.

### Downstream

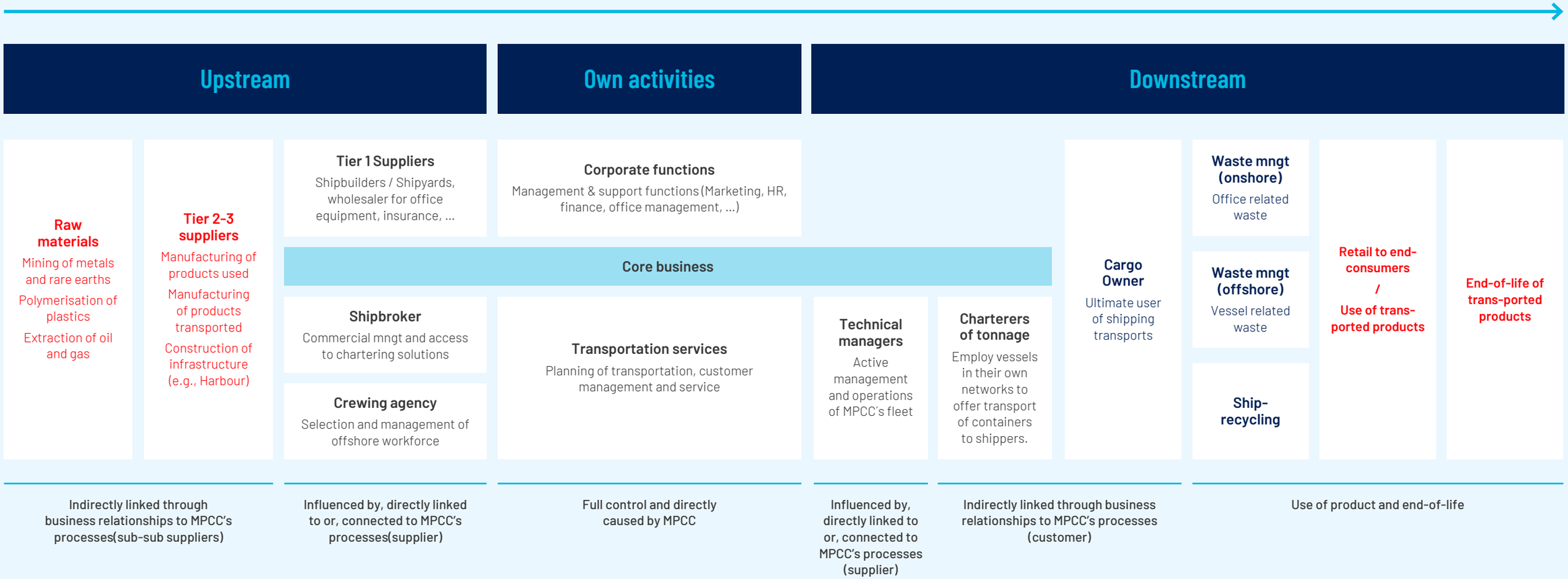
Downstream actors include MPCC's charterers and cargo owners, who use the Company's transportation services. MPCC collaborates with these stakeholders to meet operational and sustainability requirements, including adherence to the EU Fit-for-55 regulatory measures as well as international regulations such as the Carbon Intensity Indicator (CII). Waste management partners handle both office and vessel-related waste, while ship-recycling companies manage environmentally responsible disposal at the end of a vessel's lifecycle.

### Value chain inputs, outputs and outcomes

MPCC's business relies on key inputs such as resources (steel, fuel, plastics), a skilled workforce, vessel infrastructure, and external services (chartering, maintenance, and compliance). These inputs are developed and maintained through strategic partnerships with suppliers and service providers.

The Company delivers transportation services that create value for stakeholders by enabling efficient global trade. Customers benefit from reliable and sustainability-focused operations, investors experience returns through resilient financial performance, while regulatory compliance reduces risks across the value chain.

## Table 1: MPCC's value chain




Value chain positions deemed out of scope, excluded from this year's DMA, – maybe to be considered in the future

## Sustainability-related goals

MPCC's commitment to sustainability is rooted in its vision to advance sustainable container shipping that connects the world's ports to meet global needs. The Company is dedicated to embedding its material topics and achieving its ambitious sustainability goals across its own operations and value chain. Key sustainability goals include:

+ **Products and services:** MPCC aims to reduce its fleet's average GHG emission intensity – measured as emissions per deadweight ton nautical mile (AER) – by 45% until 2030 compared to 2008 levels and aims to achieve net-zero emissions by 2050.

+ **Customer categories:** MPCC works closely with global liner shipping companies and regional carriers, many of whom share ambitious decarbonization goals. Collaborative initiatives, such as cost-sharing agreements for energy efficiency retrofits, align the MPCC´s efforts with customer objectives and drive sustainability across the shipping value chain.

+ **Geographical areas and stakeholder relationships:** MPCC is committed to applying consistent sustainability standards across all regions of its operations, ensuring no differentiation between geographies. The Company's goal is to operate its intra-regional trading vessels effectively and responsibly, while maintaining compliance with local and environmental regulations such as the EU's Fit for 55 package and the IMO framework. By continuing to foster close relationships with stakeholders, including regulatory bodies and regulators, MPCC will ensure adherence to these standards and continue to advance its sustainable shipping practices globally.

MPCC's services, markets and customer groups are strategically aligned with these sustainability goals. Particularly, they reflect a clear commitment to decarbonization, safety and operational resilience. By integrating sustainability goals into its core services, MPCC strengthens its position as a trusted partner, providing solutions that meet the evolving needs of its customers and the environment.

# Sustainability Governance

## GOV-1 – The role of the administrative, management and supervisory bodies

The administrative, management and supervisory bodies of MPCC consists of the Board of Directors (the Board), the Risk, Audit and Sustainability Committee (RASC), and the Renumeration Committee. Together, the Board and the RASC are responsible for ensuring compliance with internal controls, risk management, and the oversight of sustainability-related IROs.

### Composition and diversity of the governance bodies

+ **The Board of Directors** consists of five members, two of whom are female, providing a gender diversity ratio of 40%. Of the total members, three are classified as independent non-executive directors, representing 60% independence within the supervisory body.
+ **The Risk, Audit and Sustainability** Committee comprises three members, with two members categorized as independent and one as non-independent. The committee's gender composition includes two females and one male. Collectively, these members bring specialized expertise in finance, investment, ESG, decarbonization and cleantech, aligning with MPC Container Ship's operational priorities.
+ **The Renumeration Committee**, comprising three members (two male and one female), is responsible for overseeing the Company's renumeration policies and CEO, Co-CEO & CFO as well as COO employment terms. Two of the committee members are independent.

Currently, there are no employees or worker representatives on the Board or its subcommittees.

### Access to sustainability-related expertise and skills

The supervisory and management bodies possess a variety of appropriate skills and expertise reflecting the material IROs. Members of the Board possess expertise in shipping, decarbonization, cleantech innovation, and finance, as well as experience across international markets. Members include professionals with board leadership experience across shipping, energy and technology sectors with a focus on ESG, and auditing, entrepreneurial experience in the maritime sectors, stock listings and strategic growth across global shipping markets.

Expertise is maintained through the appointment of individuals with sector-specific experience aligned with MPCC's material IROs, such as shipping decarbonization, ESG strategy, and financial oversight.

### Roles and responsibilities in sustainability oversight

The governance structure of MPCC integrates sustainability oversight through designated roles and delegated responsibilities. While the Rules of Procedure for the Board of Directors outline the Board's overall oversight of the company's operations and key topics, sustainability-related impacts, risks, and opportunities are primarily governed by the Sustainability Policy, which has been adopted by the Board.

**The Board of Directors:** The Board retains the ultimate responsibility for oversight and governance of the Company's sustainability-related IROs, and delegates the responsibility and authority to the Risk, Audit, and Sustainability Committee (RASC). The Board is responsible for approving the sustainability strategy and ensuring its alignment with the Company's operational and financial objectives.

**Risk, Audit, and Sustainability Committee (RASC):** As a preparatory and advisory body, the RASC assists the Board by defining the Company's sustainability strategy, goals, targets, and action plans. The Committee ensures a holistic risk management approach, with an equal focus on environmental, governance and social aspects. The RASC is also tasked with:

+ Overseeing the identification and management of material IROs and defining ESG priorities
+ Ensuring compliance with regulatory requirements and international sustainability standards.
+ Monitoring the integration of sustainability measures into the Company's operational processes, including decarbonization initiatives and risk management strategies.
+ Reviewing and approving the annual sustainability statement, aligning with the Company's broader strategic objectives.

**Renumeration Committee:** Although primarily responsible for renumeration-related matters, the Renumeration Committee indirectly supports sustainability objectives by ensuring alignment between executive compensation and strategic ESG goals.

**Executive Management:** The Chief Executive Officer (CEO) is accountable for the implementation of the material IROs, including actions, and signing the annual sustainability statement. Supporting the CEO are the Group Sustainability Officer, taking ownership of the IROs on a topic and content level, and the Chief Compliance Officer, who ensures the integration of sustainability policies and regular review processes.

The CEO delegates responsibilities for IROs to these officers, who report directly to the executive bodies and regularly provide updates on sustainability performance to the Board of Directors and the Risk, Audit, and Sustainability Committee (RASC).

Dedicated governance controls and procedures are integrated across key functions, including through the Sustainability & Regulatory Affairs Department, which supports the governance bodies by preparing sustainability initiatives and coordinating progress reporting.

The responsibilities for IROs are reflected in reporting structures and integrated with sustainability governance processes. Specifically, the Executive Management maintains oversight through regular engagement with governance bodies.

### Target setting and monitoring progress

The Sustainability & Regulatory Affairs Department plays a key role in supporting governance bodies with preparatory information, including suggested climate target ambitions and sustainability-related business opportunities. Key processes include:

+ Facilitating the setting of ambitious ESG targets by providing insights on double materiality assessments and decarbonization pathways.
+ Monitoring progress toward sustainability goals and aligning reporting with international standards.
+ Regularly updating the Board and committees on the status of identified impacts, risks, and opportunities.

## GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Board, RASC and Executive Management are informed about material IROs by the Sustainability & Regulatory Affairs Department at least on a quarterly basis.

The governing bodies consider material impacts, risks, and opportunities as a central part of overseeing the Company's strategy, decisions on major transactions, and risk management processes. The annual review of IROs and the Double Materiality Assessment (DMA) serves as a foundation for these considerations. These topics are discussed during RASC meetings and in broader meetings involving the Board of Directors and Executive Management.

The Company's approach to governance is evolving as it works to strengthen the integration of sustainability into decision-making processes. A structured process for integrating IROs into governance practices, including a systematic approach for evaluating trade-offs associated with these IROs, has not yet been established. However, the Company remains committed to enhancing its governance framework to further address material IROs and embedding sustainability considerations across its operations.

The administrative management and supervisory bodies have addressed all material impacts, risks and opportunities during the reporting period as part of the DMA process.

## GOV-3 – Integration of sustainability-related performance in incentive schemes

MPCC has introduced a long-term remuneration scheme tied to sustainability for its executive management. Designed to drive long-term value creation, the scheme emphasizes measurable sustainability performance and alignment with MPCC's strategic direction.

A third (33.3%) of variable remuneration for the CEO, CFO and COO is tied to achieving fleet carbon intensity targets, measured by the Annual Efficiency Ratio (AER). The scheme is reviewed by the Renumeration Committee and approved at the Annual General Meeting.

## GOV-4 Statement on Due Diligence

| CORE ELEMENTS OF DUE DILIGENCE | PARAGRAPHS OR PAGES IN THE SUSTAINABILITY STATEMENT | DOES THE DISCLOSURE RELATE TO PEOPLE AND/OR THE ENVIRONMENT? |
|---|---|---|
| **a) Embedding due diligence in governance, strategy and business model** | ESRS 2 GOV-2, page 123 | People and environment |
| | ESRS 2 GOV-3, page 123 | People and environment |
| | ESRS 2 SBM-3, page 133 | People and environment |
| | ESRS 2 SBM-3-E1, page 134 & 140–143 | Environment |
| | ESRS 2 SBM-3-E2, page 134 & 152–153 | |
| | ESRS 2 SBM-3-E3, not material | |
| | ESRS 2 SBM-3-E4, page 135 & 159 | |
| | ESRS 2 SBM-3-E5, page 135 & 162 | |
| | ESRS 2 SBM-3-S1, page 135 & 169–170 | People |
| | ESRS 2 SBM-3-S2, page 135 & 175–178 | |
| | ESRS 2 SBM-3-S3, not material | |
| | ESRS 2 SBM-3-S4, not material | |
| | ESRS 2 SBM-3-G1, page 135 & 190–191 | People and environment |

| CORE ELEMENTS OF DUE DILIGENCE | PARAGRAPHS OR PAGES IN THE SUSTAINABILITY STATEMENT | DOES THE DISCLOSURE RELATE TO PEOPLE AND/OR THE ENVIRONMENT? |
|---|---|---|
| **b) Engaging with affected stakeholders in all key steps of the due diligence** | ESRS 2 GOV-2, page 123 | People and environment |
| | ESRS 2 SBM-2, page 128 | People and environment |
| | ESRS 2 IRO-1, page 130 | People and environment |
| | *ESRS 2 MDR-P:* | Environment |
| | E1-2, page 144 | |
| | E2-1, page 154 | |
| | E3-1, not material | |
| | E4-2, page 160 | |
| | E5-1, page 163 | |
| | *ESRS 2 MDR- P:* | People |
| | S1-1, page 170 | |
| | S2-1, page 178 | |
| | S3-1, not material | |
| | S4-1, not material | |
| | G1-1, page 191 | People and environment |
| | *Topical ESRS:* | People |
| | S1-2, page 128 | |
| | S2-2, page 128 | |
| | S3-1, not material | |
| | S4-2, not material | |

| CORE ELEMENTS OF DUE DILIGENCE | PARAGRAPHS OR PAGES IN THE SUSTAINABILITY STATEMENT | DOES THE DISCLOSURE RELATE TO PEOPLE AND/OR THE ENVIRONMENT? |
|---|---|---|
| **c) Identifying and assessing adverse impacts** | ESRS 2 IRO-1, page 130 | People and environment |
| | ESRS 2 SBM-3, page 133 | People and environment |
| | ESRS 2 SBM-3-E1, page 134 & 140–143 | Environment |
| | ESRS 2 SBM-3-E2, page 134 & 152–153 | |
| | ESRS 2 SBM-3-E3, not material | |
| | ESRS 2 SBM-3-E4, page 135 & 159 | |
| | ESRS 2 SBM-3-E5, page 135 & 162 | |
| | ESRS 2 SBM-3-S1, page 135 & 169–170 | People |
| | ESRS 2 SBM-3-S2, page 135 & 175–178 | |
| | ESRS 2 SBM-3-S3, not material | |
| | ESRS 2 SBM-3-S4, not material | |
| | ESRS 2 SBM-3-G1, page 136 & 190–191 | People and environment |
| | *ESRS 2 MDR-A:* | Environment |
| | E1-3, page 145 | |
| | E2-2, page 155 | |
| | E3-2, not material | |
| | E4-3, page 160 | |
| | E5-2, page 164 | |

| CORE ELEMENTS OF DUE DILIGENCE | PARAGRAPHS OR PAGES IN THE SUSTAINABILITY STATEMENT | DOES THE DISCLOSURE RELATE TO PEOPLE AND/OR THE ENVIRONMENT? |
|---|---|---|
| **c) Identifying and assessing adverse impacts** | *ESRS 2 MDR-A:* | People |
| | S1-4, not material | |
| | S2-4, page 179 | |
| | S3-4, not material | |
| | S4-4, not material | |
| | E1-1, page 140 | Environment |
| | E4-1, page 135 | |
| | G1-1, page 191 | People and environment |
| | G1-2, page 193 | |
| | G1-3, page 194 | |
| | *ESRS 2 MDR-M:* | Environment |
| | E1-5, page 147 | |
| | E1-6, page 148 | |
| | E2-5, page 156 | |
| | E3-4, not material | |
| | E4-5, page 160 | |
| | E5-4, page 165 | |
| | E5-5, not material | |

| CORE ELEMENTS OF DUE DILIGENCE | PARAGRAPHS OR PAGES IN THE SUSTAINABILITY STATEMENT | DOES THE DISCLOSURE RELATE TO PEOPLE AND/OR THE ENVIRONMENT? |
|---|---|---|
| **c) Identifying and assessing adverse impacts** | *ESRS 2 MDR-M:*<br>S1-8, not material<br>S1-9, not material<br>S1-10, not material<br>S1-11, not material<br>S1-12, not material<br>S1-13, not material<br>S1-14, not material<br>S1-15, not material<br>S1-16, not material<br>S1-17, not material | People |

| CORE ELEMENTS OF DUE DILIGENCE | PARAGRAPHS OR PAGES IN THE SUSTAINABILITY STATEMENT | DOES THE DISCLOSURE RELATE TO PEOPLE AND/OR THE ENVIRONMENT? |
|---|---|---|
| **c) Identifying and assessing adverse impacts** | G1-4, page 196<br>G1-5, not material<br>G1-6, page 196 | People and environment |
| | *ESRS 2 MDR -T*<br>E1-4, page 146<br>E2-3, page 155<br>E3-3, not material<br>E4-4, page 160<br>E5-3, page 165 | Environment |
| | Topical ESRS<br>(Insert any other disclosure – e.g., entity or sector specific – which tracks the effectiveness of actions), page 182 | People and/or environment |

## GOV-5 – Risk management and internal control

MPCC has established risk management and internal control processes to ensure the availability, reliability, accuracy and compliance of sustainability-related data. These processes span the entire reporting lifecycle, including data collection, validation, communication and alignment with regulatory standards such as the CSRD and the ESRS.

The main features include centralized, cloud-based data management with built-in redundancy to enhance accuracy and reliability. Structured communication frameworks and a two-level responsibility structure help prevent miscommunication and inaccuracies in qualitative and quantitative data. The Company provides ongoing training and collaborates with external advisers to ensure compliance with evolving sustainability standards and mitigate risks related to misunderstandings of requirements.

MPCC employs a structured quantitative risk assessment framework to evaluate and manage risks associated with sustainability reporting. The methodology evaluates risks based on two factors: likelihood of occurrence and severity of impact. Likelihood is rated on a scale of 1 (rare) to 5 (almost certain), while severity is rated on a scale of 1 (negligible) to 5 (critical). A Risk Score (RS) is calculated as the product of these two factors: RS = likelihood × severity. Risks are categorized into three priority levels:

+ Low Priority (RS ≤ 6): Managed through regular quality checks and communication protocols.
+ Medium Priority (7 ≤ RS ≤ 15): Mitigated using data management systems, redundancy mechanisms, training programs, and external expert consultations.
+ High Priority (RS > 15): Addressed with targeted mitigation efforts to resolve critical vulnerabilities.

By applying this risk prioritization framework, the Company ensures mitigation resources are allocated effectively, focusing on medium-priority risks such as data quality and compliance with reporting standards.

### Key Risks and mitigation strategies

The main risks to MPCC's sustainability reporting are the potential for low data quality of quantitative information, inaccuracies in qualitative information from miscommunication, and insufficient knowledge of reporting standards. These risks are mitigated through its data management system, structured communication, regular check-ins and training programs.

### Integration and communication of findings

MPCC integrates findings from its risk assessments into relevant processes by reporting results to the RASC during quarterly meetings. These findings guide decision-making and prioritize actions, which are then implemented across departments, including data management, compliance, and reporting teams.

## SBM-2 – Interests and views of stakeholders

Active stakeholder engagement plays a critical role in shaping sustainability efforts. The table below outlines MPCC's key stakeholders, their areas of interest, engagement methods, frequency, and follow-up actions.

| STAKEHOLDERS | TOPICS OF INTEREST TO THE STAKEHOLDER | ARENA OF DIALOGUE | REGULARITY | MPPC'S FOLLOW-UP |
|---|---|---|---|---|
| **Employees and Consultants:**<br>Onshore staff and technical managers | Determined, commitment<br>Mindful, culture<br>Climate, environmental impact<br>Business ethics, training | Intranet, management communication<br>Performance appraisal<br>Code of conduct | Daily, Weekly, Monthly, Quarterly, Annually | Involved through employers' daily dialogue with managers<br>Involved through internal communication channels<br>Involved through weekly jour fixe involving all employees |
| **Customers and Collaboration Partners:**<br>Charterers and cargo owners using MPCC's transportation services. | Climate, environmental protection, human rights<br>Proper and efficient operation<br>Innovation | Customer meetings<br>Continuous dialogue<br>Fairs | Daily, Weekly, Monthly, Quarterly, Annually | Customer conversations with key customers<br>Engagement in customer dialogue in projects<br>Participation in professional and industry forums |
| **Suppliers: Providers of raw materials,**<br>technical services, and vessel-related infrastructure. | Climate, environmental protection, human rights, child labor<br>Business ethics, compliance, governance, labor regulations and standards<br>Working conditions | Meetings<br>Code of conduct<br>Business Partner Guideline | Monthly, Quarterly, Annually | Initiation of dialogue and participation in public debates on topics related to environmental and climate targets and industry standards<br>Contribution of expertise and open for all consultations |

| STAKEHOLDERS | TOPICS OF INTEREST TO THE STAKEHOLDER | ARENA OF DIALOGUE | REGULARITY | MPPC'S FOLLOW-UP |
|---|---|---|---|---|
| **Authorities, NGOs, and Industry Groups:**<br>Regulatory bodies and organizations influencing compliance and sustainability standards. | Anti-corruption<br>Regulatory compliance<br>Updates on status of fleet and development<br>Trends and opportunities<br>Technology, R&D with focus to reduce environmental footprint | Regular dialogue<br>Meetings and discussions<br>Sponsorships<br>Presentations and guest speakers | Quarterly, Annually | Initiation of dialogue and participation in public debates on topics related to environmental and climate targets and industry standards<br>Contribution of expertise and open for all consultations |
| **Financial Community, Investors and Owners:**<br>Stakeholders focused on MPCC's financial performance, governance, and market strategy | Financial results<br>Market outlook<br>Compliance and governance<br>Strategy | Phone and email communication<br>Investor meetings and roadshows<br>Press releases<br>Annual and quarterly reports and presentations<br>Conferences | Daily, Weekly, Monthly, Quarterly, annually | Frequent and transparent reporting<br>Senior management is always available for 1:1 meeting outside of reporting periods<br>Participating in forums, events and conferences |

The interests and views of key stakeholders are incorporated into the Company's double materiality and due diligence processes. The Board and Executive Management are kept informed through the anchoring of the double materiality assessment. There were no strategic changes implemented as a direct result of stakeholder dialogues in the reporting period. However, the Company is continuously working on improving its communication and engagement with key stakeholders to strengthen its relationships and align on broader sustainability goals.

# Materiality Assessment Process

## IRO-1 Description of processes to identify and assess material impacts, risks and opportunities

MPCC conducted its first double materiality assessment (DMA) in 2023, aligned with the ESRS and supported by an external sustainability consultancy. The assessment followed a structured four-step process, which remains the foundation of MPCC's approach.

In February 2025, MPCC updated its DMA to incorporate evolving regulatory requirements, emerging risks, and stakeholder expectations. While the methodology and four-step process remain unchanged, the 2025 update refined the materiality conclusions based on new insights and developments. The following section outlines the original 2023 DMA process, which remains the primary basis for materiality assessment, while also reflecting key updates introduced in the 2025 review.

### About the process

The process to identify, assess, prioritize and monitor MPCC's potential and actual impacts on people and the environment was informed by MPCC's due diligence framework, including reviews of:

+ Internal policies and procedures
+ Human rights assessments
+ The Enterprise Risk Management (ERM) risk inventory
+ A structured stakeholder engagement process.

A total of 21 documents, 5 internal stakeholders, and 11 external stakeholders contributed to the identification and scoring of IROs. The assessment was conducted using objective ESRS scoring parameters, where clearly material sustainability matters were deprioritized to focus on areas with greater uncertainty. Matters with no identified impacts were prioritized to avoid overlooking potential risks.

### Step 1. Mobilization

The first step was to identify relevant sustainability matters in the context of MPCC´s activities, business relationships, value chain and affected stakeholders. The process followed the due diligence framework and stakeholder engagement insights described above.

SASB standards applicable to MPCC's industry were reviewed to provide a sector-specific perspective and identify potential entity-specific topics for inclusion. The following sustainability matters were included in the list of ESRS sustainability matters at this stage to better reflect MPCC's operations and industry context:

1. De-clustering the sub-sub-topic "Health and Safety" from "Working conditions (workers in the value chain)" and defining it as its own sustainability matter under S2 – Workers in the value chain
2. Adding an entity-specific sustainability matter called "Search and Rescue"
3. Adding additional IROs to related to "Working conditions of own workforce" and "equal opportunities".

The following sustainability matters were omitted as they were deemed misaligned with MPCC's business model:

1. The sub-topic "Marine resources" in E3 – "Water and marine resources" was omitted after discussions with internal stakeholders as it holds no material relevance to MPCC's business model.
2. S3 – "Affected communities", including sub-topics "Communities' economic, social and cultural rights", and "Rights of indigenous peoples were omitted as MPCC is an offshore service and vessel operator with minimal interaction and negligible impact on affected communities.
3. S4 – "Consumers and end-users", including sub-topics "Information-related impacts", "Personal safety", and "Social inclusion" was rendered irrelevant due to the nature of MPCC's operations. As a maritime service provider, MPCC activities involve serving direct clients, and does not extend to direct consumer engagement.
4. The sub-topic "Animal Welfare" in G1 – "Business Conduct" was omitted after discussions with internal stakeholders as it holds no material relevance to MPCC's business model.

Special attention was given to areas of MPCC's activities as well as geographies that could have heightened risks of adverse impacts. This involved key areas of concern identified in the saliency assessment, including crew working conditions, ship recycling, diversity and discrimination, minority rights, supply chain management, search and rescue operations, and security-related privacy issues. Specific attention was also given to risks and impacts

associated with corruption, bribery, and human rights violations through the screening of key activities, sectors and locations linked to MPCC's value chain and business model. Each identified impact was evaluated to determine its connection to a material risk or opportunity.

### Step 2. Stakeholder engagement

The DMA was built on structured stakeholder engagement, facilitated by an independent consultant to ensure objectivity. Stakeholder input was collected through structured interviews with five internal employees (selected for their subject matter expertise), and 11 external representatives (suppliers, investors, and affected stakeholders). Employees and workers in ship recycling were represented as affected stakeholders.

Interviews were conducted to score IROs at the gross level and pinpoint the most significant IROs within each stakeholder's area of expertise. Sustainability matters with no identified IRO was highlighted in the interviews to ensure no areas were overlooked. Areas such as ship recycling and waste management received additional scrutiny due to their potential impact on MPCCs value chain. Feedback was consolidated into individual IROs, validated, and scored.

### Step 3. Workshop

A workshop with MPCC senior representatives was conducted to finalize materiality decisions. Participants reviewed a pre-read containing preliminary scoring of sustainability matters, categorized as material, non-material, and possibly material.

Sustainability matters were assessed based on the following criteria:

+ Material: IROs significantly exceed the threshold.
+ Possibly Material: IROs are marginally above or below the threshold.
+ Non-Material: IROs are well below the threshold.

Discussions focused on ensuring that thresholds accurately reflected MPCC's business model and impacts, verifying that sustainability matters were correctly categorized as material or non-material, and confirming that all significant IROs had been identified and appropriately scored. The IRO scores were refined based on the discussions and sustainability matters were confirmed or reclassified.

### Step 4. Finalization and documentation

The final documentation comprised a management presentation summarizing the results and a workbook with detailed data at the IRO level.

### Scoring thresholds and methodology

The thresholds and time horizons used for scoring are based on ESRS 1 and to the extent possible on the ERM system of MPCC but adjusted where not functionally applicable. The thresholds follow the categorization of short-, medium-, and long-term horizons, defined by the following intervals:

1. **Short term:** <1 year
2. **Medium term:** 1 – 5 years
3. **Long term:** > 5 years

The quantitative scoring parameters are based on the requirements of the ESRS 1:

+ **Impact materiality:** Scale, scope, irremediability, likelihood (based on if an impact is positive/negative and actual/potential). The threshold for human rights-related impacts was lowered based on ESRS 1 requirements.
+ **Financial materiality:** Financial magnitude of risk/opportunity, likelihood, and the nature of the financial effect.

There were three key decision points throughout the process:

| KEY DECISION POINT | DECISION MAKING | INTERNAL CONTROL PROCEDURES |
|---|---|---|
| Identification of people who can identify IROs related to sustainability matters. | The identification of stakeholders to engage with was done by the project coordinator | + Control that all sustainability matters were covered by stakeholders.<br>+ Control that all sustainability matters had identified IROs throughout the stakeholder engagement process. If none were identified, sanity checks with key stakeholders to see that this was reasonable due to the nature of the business was performed. |
| Scoring of sustainability matters. | Scoring of sustainability matters was conducted by the stakeholder who identified it. | + Scoring includes a description of rationality for each IRO.<br>+ Scoring was based on ESRS guidelines with a consistent application of methods due to the usage of an IRO workbook.<br>+ ERM system of MPCC has been utilized to the extent possible |
| Final workshop and placement of sustainability matters. | Senior management and reporting specialists took | + The workshop focused on sustainability matters where scoring was close to the threshold to ensure correct materiality decision for borderline cases and sustainability matters where participants were unsure of preliminary placement based on their experience and knowledge of MPCC.<br>+ Evaluation of scoring was done based on 3 criteria:<br>+ Does the scoring of financial materiality match MPCC's business model?<br>+ Does the scoring on impact material ring true relative to MPCC's effect on others?<br>+ Does the existing scoring make sense? |

### Process integration, input parameters and revisions

Currently, the process to identify, assess, and manage impacts, risks and opportunities is not integrated into MPCC's ERM system. No formalized process exists to incorporate DMA results into the overall risk management framework.

The assessment utilized internal documents and representative internal and external resources. Data points were triangulated across multiple sources to ensure reliability, with a representative overseeing comprehensive coverage of sustainability matters. Future revisions will follow an established review schedule to maintain accuracy and relevance.

### E1 disclosure requirement related to ESRS 2 IRO-1

MPCC's climate-related impacts, risks and opportunities were identified and assessed during the DMA, which was followed by a resilience analysis outlined in SBM-3. The process evaluated the Company's GHG emissions and their impacts on climate change, particularly emissions from vessel operations, which account for the majority of Scope 1 emissions.

Physical risks were assessed based on how MPCC's assets and operations may be exposed to climate-related hazards such as extreme weather events. This assessment included upstream risks, such as those arising from ship recycling activities, and risks to core fleet operations, including potential damage to vessels and disruptions to port accessibility due to severe weather conditions.

Transition risks and opportunities were identified through the examination of regulatory developments. the DMA process did not apply a formal 1.5°C scenario model to evaluate transition events.

MPCC has aligned its climate ambition with the IMO's 2023 GHG Strategy, which was developed based on scientific findings, climate scenario models, and impact assessments with global consensus. While formal climate scenarios were not directly used in MPCC's assessment, the evaluation of climate-related risks and opportunities was informed by regulatory trends, technological advancements and stakeholder input across short-, medium-, and long-term time horizons. The materiality of climate-related risks and opportunities was evaluated through insights provided by internal and external stakeholders.

### E2, E3, E4, and E5 disclosure requirement related to ESRS 2 IRO-1

During the DMA process, interviews were conducted with both internal and external stakeholders to identify and evaluate actual and potential IROs related to pollution, water, biodiversity and resource use.

Stakeholders were selected based on their expertise in MPCC's operations, value chain, and regulatory obligations to provide comprehensive insights into the Company's sustainability context.

MPCC has not conducted formal screening of site locations and business activities nor engaged in consultations with affected communities to identify and assess material pollution-related IROs in its operations or value chain. Systemic risks associated with biodiversity and ecosystem dependencies were not part of scope for the DMA assessment.

#### 2025 Update

MPCC periodically reviews its DMA to evaluate its continued relevance and robustness. These reviews consider evolving trends, key assumptions, contextual factors, and changes in the regulatory landscape. The last review was conducted in February 2025 with a focus on ensuring the results were robust and reflective of industry developments. The main change was caused by MPCC's decision to categorize the offshore workforce as workers in the value chain rather than its own workforce. This decision was backed by the comprehensive value-chain analysis and mapping as shown on page 120. Moving the IROs related to this group of workers from S1 – Own workforce to S2 – Workers in the value chain resulted in some changes in the material sustainability matters. After this change, Health & safety and other work-related rights for own workforce were no longer material sustainability matters, while the materiality of working conditions and other work-related rights were solidified for S2 – Workers in the value chain. The outcome of the DMA can be found below.

### SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The material impacts, risks, and opportunities identified through the materiality assessment are summarized below and described in detail in the topical chapters. Unless stated otherwise, all identified impacts, risks, and opportunities are fully addressed within the ESRS disclosure requirements.

## Table 2: MPCC's material impacts, risks and opportunities

### E1 Climate Change

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | |
|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM |
| Climate change mitigation – Scopes 1, 2 and 3 GHG emissions contribute to climate change | Actual negative impact | ● | ● | ● | ● | | |
| Energy – Energy-intensive operations contribute to climate change | Actual negative impact | ● | ● | | ● | | |
| Climate change mitigation – Positive impact of methanol-fueled vessels | Actual positive impact | ● | | | | ● | |
| Climate change mitigation – Increased costs from GHG pricing | Risk | | ● | | | ● | |
| Climate change mitigation – Transitional risk of increasing regulatory demand for decarbonization | Risk | | ● | | | | ● |
| Climate change mitigation – Competitive advantage through early positioning | Opportunity | | ● | | | ● | |
| Climate change mitigation – Competitive advantage from lower-emissions services | Opportunity | | ● | | | ● | |
| Climate change mitigation – Methanol vessels as an advantage in FuelEU maritime regulations | Opportunity | | ● | | ● | | |
| Climate change mitigation – Reduction in GHG emissions through investment in newbuilt vessels | Opportunity | | ● | | | ● | |
| Climate change mitigation – Increased revenues through maintaining a CII above average | Opportunity | | ● | | ● | | |

### E2 Pollution

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | |
|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM |
| Air pollutants from own operations | Actual negative impact | | ● | | ● | | |
| Pollution from antifouling measures | Actual negative impact | | | | | | |
| Improperly managed hazardous waste from ship recycling | Actual negative impact | | ● | | ● | | |
| Increasing regulatory pressure to reduce air pollutant emissions | Risk | | ● | | | ● | |
| Whistleblower case for deliberate pollution of water in US territory | Risk | | ● | | | ● | |
| Non-compliance with EU ship recycling rules on inventories of hazardous substances | Risk | | ● | | | ● | |

## E4 Biodiversity and ecosystems

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | |
|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM |
| Biofouling on the hull of vessels | Actual negative impact | | ● | | ● | | |
| GHG emissions driving biodiversity loss | Actual negative impact | | | | | | |

## E5 Resource use and circular economy

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | |
|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM |
| Resource inflows – high intensity resource consumption | Actual negative impact | ● | | | ● | | |
| Resource inflows – paints used for hull | Actual negative impact | | ● | | | ● | |

## S1 Own Workforce

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | | |
|---|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM | RECURRING |
| **Working conditions** | | | | | | | | |
| Potential case of high levels of stress and long working hours for own employees | Potential negative impact | | ● | | | ● | | |
| Potential challenges with employee retention and turnover | Potential negative impact | | ● | | ● | | | |
| Risk of employee stress and burnout | Risk | | ● | | | ● | | |

## S2 Workers in the value chain

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | | |
|---|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM | RECURRING |
| **Working conditions** | | | | | | | | |
| Decreased lifespan of ship recycling workers | Actual negative impact | | | ● | | | | ● |
| Accidents and fatalities in ship recycling yards | Potential negative impact | | | ● | ● | | | |
| Fatalities of workers in the value chain | Potential negative impact | ● | | | ● | | | |
| Suboptimal working conditions for supply chain workers | Potential negative impact | | | ● | | | | ● |
| Stress in the workforce (seafarers) | Potential negative impact | | | ● | ● | | | |
| High retention of staff contracts of crew onboard vessels | Actual positive impact | | | ● | | | | ● |
| Overtime seafarers | Actual positive impact | | | ● | | | | ● |
| Major health and safety issues (seafarers) | Potential negative impact | | | ● | ● | | | |
| Non-compliance with Hong Kong convention on working conditions of workers in ship recycling | Risk | | | ● | ● | | | |
| Societal development leads to people losing interest in jobs with hard-working conditions | Risk | | | ● | | ● | | |
| Recording of LTIF and "Lessons Learned" | Opportunity | | | ● | ● | | | |

## S2 Workers in the value chain

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | | |
|---|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM | RECURRING |
| **Other work-related rights** | | | | | | | | |
| Human rights abuses of smaller suppliers down the value chain | Potential negative impact | ● | | | | ● | | |
| Limited freedom of ship recycling yard workers | Potential negative impact | | | ● | ● | | | |
| Minors working in shop recycling yards | Potential negative impact | | | ● | ● | | | |
| Single rooms onboard of vessels (Seafarers) | Actual positive impact | | | ● | | | | ● |
| Availability of internet connection (seafarers) | Actual positive impact | | | ● | | | | ● |

## G1 Business Conduct

Material impacts, risks and opportunities

| | | LOCATION IN THE VALUE CHAIN | | | TIME HORIZON | | |
|---|---|---|---|---|---|---|---|
| | | UPSTREAM | OWN OPERATIONS | DOWN-STREAM | SHORT-TERM | MEDIUM-TERM | LONG-TERM |
| Corporate culture – Openness and values of trust and collaboration | Positive actual impact | | ● | | ● | | |
| Payment practices – Payment of suppliers on time | Positive actual impact | ● | | | ● | | |
| Management of relationships with suppliers – Engagement with ship recycling yards | Positive potential impact | | | ● | ● | | |
| Payment practices – Technical manager needs to stop management of an MPCC vessel due to lack of funding | Risk | | ● | | ● | | |
| Corruption and bribery – Money laundering risk due to the nature of the business | Risk | | ● | | ● | | |

## Resilience assessment

In 2024, MPCC conducted a resilience assessment to evaluate its capacity to address material environmental impacts, risks, and opportunities. The assessment aligned with MPCC's DMA, incorporating key risks across fleet operations and downstream activities such as shipbuilding and technical management. Downstream logistics operations were reviewed but excluded from detailed analysis due to lower material significance.

The analysis, completed in Q4 2024, employed scenario-based modeling to assess MPCC's exposure to climate transition risks, pollution mitigation, resource circularity, and regulatory shifts affecting its business model. The assessment assumes ongoing uncertainties in alternative fuel availability, infrastructure development, and regulatory changes, necessitating continuous monitoring and strategic flexibility. While emission-reducing technologies and port-based renewable energy infrastructure are expected to expand, the scale and timing of these developments remain uncertain.

### Climate resilience

MPCC's climate resilience assessment evaluated its ability to manage transition risks and market uncertainties over short (1–5 years), medium (5–10 years), and long-term (10–30 years) horizons:

+ In the short term, the Company focuses on regulatory compliance, particularly Ship Energy Efficiency Management Plans (SEEMP) and FuelEU Maritime, while maintaining a competitive CII rating.
+ Medium-term resilience is supported by investments in dual-fuel methanol vessels and securing synthetic marine diesel volumes, including co-investing in INERATEC, a company producing sustainable synthetic fuels.
+ Long-term resilience depends on scalable renewable fuel and green technologies availability, with MPCC's fleet renewal strategy and participation in green shipping corridors reinforcing adaptability.

The assessment found MPCC to be highly resilient in the mid-term, given its proactive investment strategy and fleet renewal efforts. However, long-term resilience remains contingent on technological advancements, infrastructure readiness, and regulatory alignment. Continued investment in alternative fuels and strategic partnerships will be key to maintaining a competitive position.

### Assessment of resilience related to E2 Pollution

MPCC identified air and water pollution risks from vessel operations and hazardous material management in ship recycling. Use of exhaust gas treatment systems and technical manager oversight supports strong mid-term resilience.

However, the assessment identified rising regulatory pressures on ship recycling and stricter EU water pollution controls, which may drive compliance costs. To sustain long-term resilience, MPCC will need to strengthen mitigation measures, particularly in hazardous waste management and sustainable ship decommissioning.

### Assessment of resilience related to E5 Resource use and circular economy

MPCC's operations involve significant use of steel, particularly for vessel construction and maintenance. The Company's Ship Recycling Policy adheres to international conventions to manage recyclable materials responsibly, reducing waste.

Efforts to enhance circular resource use include waste reduction and material recycling initiatives. MPCC monitors resource inflows and outflows, exploring opportunities for resource efficiency improvements through partnerships and best practices in resource management.

The assessment found MPCC to be resilient in the mid-term, with regulatory compliance and ongoing efficiency measures securing stability. Under increasing regulatory demands from the EU Circular Economy Action Plan and stricter material traceability requirements, maintaining compliance with the highest ship recycling standards and ensuring sustainable material sourcing will remain key to reinforcing long-term resilience.

MPCC's resilience strategy is built on regulatory compliance, fleet modernization, and strategic investments in alternative fuels. Through ongoing assessments, scenario analysis, and adaptation measures, the Company strengthens its ability to navigate environmental challenges and seize opportunities within the global low-carbon transition.

# ENVIRONMENTAL INFORMATION

# E1 CLIMATE CHANGE

MPCC acknowledges the crucial role of maritime transportation in global trade while recognizing the environmental impact of shipping operations. MPCC is committed to responsible business practices, striving to minimize its climate footprint and manage related risks. Addressing climate change requires reducing emissions, optimizing energy use, and adapting to evolving environmental conditions across the value chain, including its own operations.

MPCC's climate strategy prioritizes emissions reduction through targeted initiatives such as enhancing fuel efficiency, modernizing the fleets, and improving operations. The Company actively collaborates with industry stakeholders and explore innovative technologies to drive decarbonization throughout the value chain.

### KPIs

+ Reduce MPCC Well-to-Wake GHG emissions intensity (By 45% by 2030 compared to 2008)

### Relevant Policies

+ Sustainability policy
+ Environmental policy

### Reporting Standards Used

+ ESRS E1

### Relevant SDGs

### E1-1 Transition Plan for climate change mitigation

MPCC has several activities in place to achieve its defined decarbonization targets. While these activities do not constitute a formal climate transition plan at the time of this report, the Company is actively working on its development. The transition plan is scheduled for final approval by the Risk, Audit, Sustainability Committee and the Board in 2025.

MPCC remains fully committed to managing its climate priorities and has already implemented a comprehensive sustainability strategy with defined targets. The timeline for the implementation of the transition plan reflects the Company's dedication to ensuring a robust, effective approach aligned with both regulatory requirements and its broader sustainability objectives.

# Material Impacts, Risks and Opportunities

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Climate change mitigation – Scopes 1, 2 and 3 GHG emissions contribute to climate change | Actual negative impact | Own operations, upstream, downstream | Short-term |
| Energy – Energy-intensive operations contribute to climate change | Actual negative impact | Own operations | Short-term |
| Climate change mitigation – Positive impact of methanol-fueled vessels | Actual positive impact | Upstream | Medium-term |
| Climate change mitigation – Increased costs from GHG pricing | Risk | Own operations | Medium-term |
| Climate change mitigation – Transitional risk of increasing regulatory demand for decarbonization | Risk | Own operations | Long-term |
| Climate change mitigation – Competitive advantage through early positioning | Opportunity | Own operations | Medium-term |
| Climate change mitigation – Competitive advantage from lower-emissions services | Opportunity | Own operations | Long-term |
| Climate change mitigation – Methanol vessels as an advantage in FuelEU maritime regulations | Opportunity | Own operations | Short-term |
| Climate change mitigation – Reduction in GHG emissions through investment in newbuilt vessels | Opportunity | Own operations | Medium-term |
| Climate change mitigation – Increased revenues through maintaining a CII above average | Opportunity | Own operations | Short-term |

The DMA determined the following impacts, risks and opportunities related to climate change. See page 137 in ESRS 2 for a description of the resilience assessment of MPCC's strategy and business model in relation to climate change.

### Material impacts

**Climate change mitigation – Scopes 1, 2 and 3 GHG emissions contribute to climate change**

MPCC emits GHG emissions from its own operations (scope 1 and 2) and throughout its value chain (scope 3). These emissions have an actual negative impact on climate change over the short term.

GHG emissions from the Company's own operations (Scopes 1 and 2) are primarily driven by fuel consumption in its fleet, which

constitutes a significant portion of its climate-related impact. The Company's Scope 3 emissions are generated throughout both the upstream and downstream supply chain.

To mitigate these impacts, MPCC is investing in renewable fuel vessels, which offer a lower-carbon alternative to conventional marine fuels. This forms part of MPCC's broader decarbonization strategy, with further actions detailed in E1-2.

### Energy – Energy-intensive operations contribute to climate change

Operating in an energy-intensive industry, MPCC has a direct negative impact on climate change through energy consumption in its own operations. Fuel consumption for vessel propulsion is a major source of GHG emissions, which drive global warming and contribute to climate change.

MPCC enhances energy-efficient vessel operations by equipping crews with advanced training and competencies to optimize fuel use. In parallel, the Company drives emissions reduction through fleet renewal, vessel retrofitting, and investments in renewable fuel-ready ships, making energy efficiency a core pillar of its decarbonization strategy.

### Climate change mitigation – Positive impact of renewable-fueled vessels

MPCC has an actual positive impact on climate change through its investment in methanol-fueled vessels. Operationally, these vessels, equipped with dual-fuel engines, will partially run on methanol, reducing the Company's reliance on high-intensity fossil fuels. Once in operation, these vessels will also contribute to the reduction of emissions from vessel operations, which are a key source of shipping-related climate impacts.

The primary positive impact lies in the upstream supply chain. If methanol is sourced from renewable feedstocks (such as biomass), it can significantly reduce upstream (Scope 3) emissions associated with fuel production. Methanol is commonly produced from natural gas, which results in substantial carbon emissions during production. The methanol derived from renewable sources has a much lower carbon footprint, contributing to greater overall reductions in GHG emissions across the value chain. At an industry level, integrating these vessels into the global fleet helps drive demand for renewable methanol, which in turn supports the transition to cleaner fuels and strengthens supply availability.

MPCC is committed to investing in renewable-fueled vessels to reduce upstream Scope 3 emissions in the well-to-tank phase, as part of its decarbonization strategy.

## Material risks

### Climate change mitigation – Increased costs from GHG pricing

MPCC is exposed to regulatory and financial risks from GHG pricing mechanisms, such as the EU Emissions Trading Scheme (EU ETS) and fuel standards, which are expected to increase the cost of emissions and operational expenses. The distribution of these additional costs remains uncertain, with ongoing discussions on whether MPCC, its customers, or end-users will ultimately bear the financial burden.

The risk is located within MPCC's own operations and is expected to materialize in the medium-term. In response, the Company is actively monitoring regulatory developments and integrating GHG pricing mechanisms alongside potential fines into its strategy, including revising contractual terms to allocate GHG-related costs effectively across the value chain. MPCC invests in low-carbon technologies, retrofits and alternative fuels to limit its GHG cost exposure.

The potential increase in costs from GHG pricing mechanisms can have a cascading impact on the business model, driving higher operational expenses and the need for increased investments to mitigate exposure to GHG-related costs. MPCC has not experienced financial effects from this risk so far.

### Climate change mitigation – Transitional risk of increasing regulatory demand for decarbonization

MPCC faces a long-term transitional risk driven by the rapid increase in regulatory demands for decarbonization. Regulatory bodies, including the International Maritime Organization (IMO), have recently implemented mandatory decarbonization targets that align with the 1.5°C temperature goal of the Paris Agreement. These developments may necessitate significant retrofits, technological investments, and further upgrades, placing shipowners, including MPCC, in a position of having to make large-scale capital expenditures amidst regulatory uncertainty.

The risk originates in the Company's own operations and is expected to materialize in the medium-term. MPCC is actively monitoring regulatory developments and collaborating with stakeholders to

assess and implement retrofitting and upgrade measures to mitigate compliance risks while enhancing fleet efficiency.

Stricter decarbonization regulations could have substantial effects on MPCC's strategy and business model by causing increased capital expenditure for fleet upgrades and higher operating costs. MPCC has not experienced financial effects from this risk so far.

## Material opportunities

### Climate change mitigation – Competitive advantage through early positioning

MPCC has identified an opportunity to gain a competitive advantage by being an early adopter of decarbonization measures in the shipping industry. By proactively positioning itself ahead of regulatory requirements, MPCC can strengthen its market position, particularly as regulations become more stringent and long asset lifespans in the shipping sector require forward-thinking strategies. Early investments in alternative fuels and low-carbon technologies are expected to strengthen MPCC's capacity to offer sustainable shipping solutions and generate long-term commercial value. The opportunity is situated within MPCC's own operations and is projected to unfold over the medium term.

The current financial effects involve ongoing investments in fleet retrofits and eco-design vessels aimed at improving fleet efficiency and compliance. MPCC has already taken steps to reinforce this position by establishing a dedicated task force tasked with evaluating and implementing alternative fuel technologies and exploring innovative business models, including carbon capture opportunities.

### Climate change mitigation – Competitive advantage from lower-emissions services

The transition towards lower-emissions services in the shipping industry presents MPCC with another opportunity to gain a competitive advantage against its peers. Clients increasingly prefer service providers capable of delivering lower-emissions solutions, driven by regulatory changes and rising costs for fuel-intensive industries. The trend is expected to strengthen MPCC's market position, as its energy-efficient fleet offers a competitive advantage over peers with less efficient assets. This opportunity is situated within the Company's own operations and is expected to unfold in the long-term.

The current financial effects include investments in new technologies and energy efficiency measures to enhance marketability of MPCC's fleet. These investments make the vessels more attractive to charterers, allowing for higher utilization rates even during weak charter markets. MPCC's low leverage enables it to maintain these strategic investments without overextending its financial position.

The Sustainability and Regulatory Affairs and the Technical Department are leading MPCC´s efforts to assess and implement low-carbon and alternative fuel technologies, such as dual-fuel and energy-efficient vessels. It is key to the Company's long-term strategy and business model through providing the opportunity to embed sustainability as a core operational priority while leveraging low-carbon innovations to secure a competitive advantage.

### Climate change mitigation – Methanol vessels an advantage in FuelEU maritime regulatory setting

The growing focus on emissions reduction in the shipping sector presents MPCC with an opportunity to gain a competitive edge. The FuelEU Maritime initiative aims to drive demand for renewable and low-carbon fuels, incentivizing the adoption of cleaner technologies across the industry. MPCC's investment in methanol-fueled vessels positions it to capitalize on these developments. As regulations take effect, having low-emissions vessels in its fleet will strengthen MPCC's market position by ensuring compliance and attracting sustainability-focused clients.

This opportunity arises in MPCC's own operations and is expected to materialize in the short-term. MPCC has already taken proactive steps by investing in dual-fuel methanol vessels as part of its fleet renewal and decarbonization strategy. This is part of its long-term strategy to strengthen its position in sustainability-driven shipping markets.

### Climate change mitigation – Reduction in GHG emissions through investment in newbuilt vessels

Investing in newbuild vessels presents MPCC with an opportunity to achieve regulatory compliance and market differentiation. As environmental regulations become increasingly stringent, eco-friendlier vessels can provide a long-term competitive edge by meeting sustainability requirements. These newbuilds offer operational benefits, including reduced GHG emissions, improved fuel efficiency, and lower maintenance costs. Such investments are expected to strengthen MPCC's market position by enhancing its reputation as a socially responsible and forward-thinking shipping provider.

This opportunity is located within MPCC's own operations and is expected to materialize in the medium-term. MPCC is actively assessing newbuilding investments and business models to replicate early successes in environmentally compliant operations with other customers. These steps are designed to maximize financial returns while ensuring long-term adaptability to climate-related and regulatory risks.

### Climate change mitigation – Increased revenues through maintaining a CII above average

MPCC has a material opportunity to enhance its reputation and market position by maintaining a Carbon Intensity Indicator (CII) rating of C or better. While there are no current regulatory penalties for failing to meet the threshold, stakeholders, financiers, and customers pay increasing attention to the carbon intensity of vessels in their operations and portfolios. MPCC is positioned to enhance its access to business opportunities and maintain long-term customer relationships through ensuring a consistent CII rating.

This opportunity occurs in the short-term where it primarily affects the Company's own operations. MPCC is currently taking steps to maintain a favorable CII rating through investing in decarbonization measures and fleet optimization strategies.

# Impacts, Risk & Opportunity Management

## E1-2 Policies related to climate change mitigation and adaptation

### Environmental Policy

The Environmental Policy defines MPCC's objectives, principles and commitments to protect the environment by minimizing its carbon footprint, managing climate-related risks, and seizing opportunities for sustainable improvements. It drives the management of climate-related IROs by setting out strategic goals and principles that guide MPCC's environmental management and investments in energy-efficient measures, and fleet renewal activities. The policy addresses these as follows:

To address climate change mitigation, the policy outlines the Company's overall direction to reduce GHG emissions through fleet optimization and emission mitigation strategies. These include a commitment to invest in energy-efficient technologies and adopt measures to reduce fuel consumption and GHG emissions. The policy promotes fleet upgrades and renewals if economically feasible and encourages the development and diffusion of environmentally friendly technologies.

In the context of energy efficiency, the Policy sets out the Company's goals to continuously optimize vessel performance through the implementation of improved SEEMP across all vessels. The policy supports operational efficiency through vessel retrofits, fuel consumption reduction measures, and continuous monitoring of key performance indicators (KPIs) such as Energy Efficiency Operational Indicator (EEOI) and CII.

MPCC's Compliance Officer holds the overall accountability for implementing the Environmental Policy. It applies to all employees, subsidiaries, contractors, and supply chain partners, requiring these stakeholders to be informed of and comply with the outlined environmental responsibilities. The policy also seeks to ensure that stakeholders in the upstream and downstream activities contribute to maintaining its environmental goals and regulatory compliance.

### Sustainability Policy

The Sustainability Policy defines MPCC's objectives, principles, and commitments to integrate sustainability across its operations and business activities. The policy aims to mitigate negative impacts on the environment, society, and governance, while contributing positively to the Company's long-term financial resilience and growth. It guides the management of material IROs through strategic goals that address both regulatory compliance and stakeholder expectations.

The Sustainability Policy supports sustainable operational practices and investments in new technologies, including the use of methanol-fueled vessels. It emphasizes compliance with decarbonization regulations, such as GHG pricing mechanisms and emission reduction targets. The policy also seeks to enhance MPCC's competitive advantage by providing lower-emissions services and maintaining an above-average Carbon Intensity Indicator (CII).

Related to sustainable business practices, the Policy outlines the Company's commitment to balance ecological and economic considerations in decision-making processes. This includes managing both the risks and opportunities associated with climate change, regulatory shifts, and technological developments. It promotes supplier and stakeholder partnerships that align with MPCC's sustainability principles, particularly regarding sustainable sourcing, ship recycling, and emission controls.

Sustainability activities are managed and monitored through defined mechanisms. The policy includes commitments to train employees and collaborate with contractors and suppliers to meet sustainability objectives. Active dialogue with stakeholders supports transparency and accountability.

The Compliance Officer is responsible for implementing the Sustainability Policy. The policy applies to all employees, subsidiaries, contractors, and supply chain partners. It is reviewed annually to maintain alignment with sustainability objectives and regulatory requirements.

## E1-3 Actions related to climate change mitigation and adaptation

Most of the Company's GHG emissions are linked to vessel operations, primarily due to fuel consumption associated with shipping activities. Although a formal action plan has not been adopted, the following steps have been taken to prevent and address MPCCs' material IROs related to climate change mitigation and energy efficiency. These actions are structured around four key areas: Fleet renewal, the uptake of renewable energy, energy efficiency improvements and collaboration on innovation and technology development.

### Transition to low-carbon fuels

As part of its decarbonization strategy, MPCC is preparing for the integration of renewable fuels. The Company has ordered three dual-fuel methanol vessels, with one delivered in January 2025, the second scheduled for delivery in Q2 2025, and the third in 2026. Additionally, the Company is exploring other renewable fuel and energy alternatives to reduce reliance on conventional fossil fuels.

These initiatives could reduce GHG reductions by 40–50% for specific vessels, depending on fuel availability and scalability. While initial steps have been taken, widespread adoption over the next 5–10 years will depend on factors such as technological advancements, fuel market availability, charterers' willingness to absorb cost premiums, and the development of global renewable fuel production and bunkering infrastructure. Competing demand from other industries may also impact the pace of transition.

### Energy efficiency improvements

In 2023, MPCC assessed its fleet's overall weighted average CII, achieving an average C rating. This rating was sustained in 2024 through retrofitting and operational efficiency measures, reducing carbon intensity. The CII framework mandates ongoing reductions of 2% every year after -5% until 2025 in operational carbon intensity to maintain or improve a ship's rating from 'A' (major superior) to 'E' (inferior). MPCC's recalculated 2024 rating remains at "C," reaffirming its commitment to fleet efficiency and industry sustainability objectives.

A core element of MPCC's decarbonization strategy is the implementation of fleet-wide energy efficiency initiatives. In 2024, the Company completed multiple retrofitting projects, including propeller optimization, installation of boss cap fins and pre-swirl devices, and hull modifications to reduce drag and enhance hydrodynamics. Additional energy-saving technologies installed include waste heat recovery systems, CJC filters, pre-heating systems for main and auxiliary engines, variable frequency drives for pumps, LED lighting, upgraded autopilots, and low-friction silicon paints. These measures have directly reduced fuel consumption and emissions.

MPCC has strengthened its SEEMP across the fleet to document, monitor, and optimize these improvements. Looking ahead, further fleet-wide retrofitting projects are planned over the next 3–5 years to improve fuel efficiency and emissions performance, ensuring regulatory compliance and supporting long-term decarbonization objectives.

As part of its fleet renewal strategy, MPCC sold five vessels in 2024, averaging 17 years in age and 2,300 TEU in size, and acquired seven vessels averaging 10 years and a capacity of 3,400 TEU. The Company also took delivery of two 5,500 TEU eco-design vessels.

### Innovation and collaboration

MPCC is engaged in research and collaboration to address scope 3 emissions and accelerate decarbonization in the shipping sector. Partnering with key stakeholders, including the Maersk McKinney Moller Centre for Zero Carbon Shipping, the Company is aiming to drive innovation in emission reduction technologies. Key research and development activities include the development of eco-ship designs and engine retrofitting for renewable fuel use the development of "Katalyst," a non-profit 'book and claim' registry and the establishment of green shipping corridors.

These efforts are expected to contribute to long-term decarbonization, with successful implementation dependent on ongoing technological advancements and external research progress.

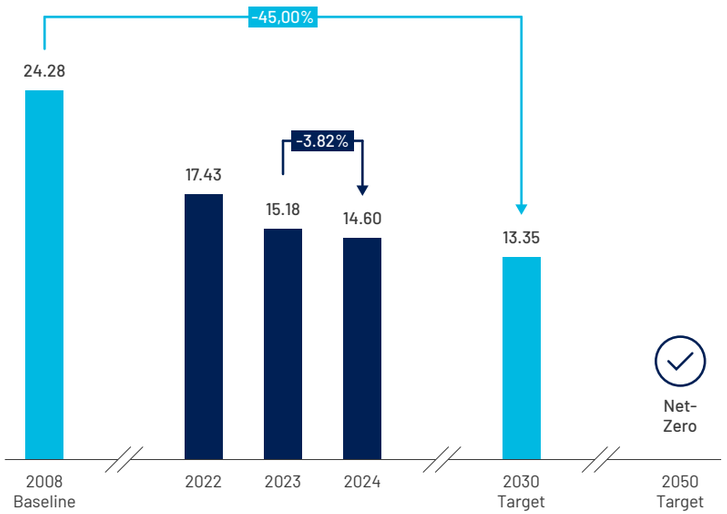
### Financial resources and dependencies

MPCC has allocated capital and operating expenditures to support its decarbonization actions and initiatives, as reflected in the financial statements. While internal investment is a key driver, market dynamics—such as fuel availability, regulatory developments, and charterer demand—will play a critical role in shaping the transition.

## E1-4 Targets related to climate change mitigation and adaptation

In line with its environmental policy and commitment to reducing GHG emissions, MPCC has established a decarbonization pathway that exceeds the ambition of the IMO 2023 GHG Strategy. While not aligned with the Science-Based Targets initiative (SBTi), MPCC's targets are informed by scientific research and sector-specific emission reduction scenarios. These targets are consistent with the Paris Agreement's ambition to hold global temperature increase to well below 2°C above pre-industrial levels.

WELL-TO-WAKE GHG EMISSION INTENSITY (AER) BASED ON GLEC V.3




### 2030 target

MPCC aims to reduce its Scope 1 and Scope 3 GHG emissions intensity by 45% by 2030, calculated on a well-to-wake basis using a 2008 baseline. Scope 1 emissions include direct emissions from vessel operations and fuel consumption, while Scope 3 emissions relate to upstream and downstream activities within the shipping value chain The target covers $CO_2$, $CH_4$, and $N_2O$ reductions and is consistent with MPCC's GHG inventory boundaries, incorporating both direct and lifecycle emissions. These are gross targets, achieved without dependence on GHG removals, carbon credits, or accounting for avoided emissions.

The 45% reduction target for 2030 surpasses the IMO interim reduction milestone of -40% by 2030. With the focus on setting targets for Scope 1 and Scope 3 emissions, MPCC has not established reduction targets for its Scope 2 emissions.

### 2050 target

MPCC has set an ambitious target to achieve net-zero emissions by 2050, in line with the ambition levels established of the IMO 2023 GHG Strategy. The IMO's pathway targets a 40% reduction in carbon intensity by 2030 and a 20% cut in total GHG emissions from 2008 levels, with net-zero emissions by 2050. MPCC's approach surpasses these objectives by committing to a higher 2030 reduction threshold.

### Baseline and measurement approach

MPCC's targets follow a sectoral decarbonization pathway in line with the IMO 2023 GHG Strategy. The 2008 baseline, which serves as the benchmark for emissions reduction targets, was independently calculated, certified, and verified using operational data from 2018 to 2024.

+ The baseline GHG intensity target is 24.3 grams $CO_2e$ per ton-mile, consistent with industry standards for emissions measurement.
+ The Global Logistics Emissions Council (GLEC) Framework (Version 3) was applied to develop the targets and baseline.
+ The targets are subject to external influences, including technological advancements and market dynamics, both of which will shape the feasibility of further emissions reductions.

MPCC has identified key decarbonization levers to achieve its GHG reduction targets. These include:

+ **Energy efficiency measures:** Retrofitting and operational improvements (e.g., propeller optimization, energy-saving decides, SEEMP improvements) contribute approximately 15–25% of total GHG reduction.
+ **Renewable fuel adoption:** Depending on the share and blending of renewable fuels (e.g., biofuels, renewable methanol, ammonia), this lever can contribute 20–80% of reductions
+ **Fleet modernization:** Newbuild orders and eco-friendly vessel acquisitions are expected to achieve an additional 10–15% reduction
+ **Renewable energy integration:** Adoption of alternative maritime power (AMP) (onshore power supply) is expected to add 5–10% in GHG reduction.

## E1-5 Energy Consumption and mix

MPCC's energy consumption derives from fossil forces, primarily crude oil and petroleum products. In 2024, total energy consumption amounted to 5,398,050.93 MWh, representing a 10.98% reduction compared to 2023.

A detailed breakdown is disclosed in Table I: Energy Consumption and Mix, while Page 150 outlines the methodologies and key assumptions used to calculate E1-5.

MPCC operates in the maritime transport and shipping industry, a high-impact sector classified under the broader "transportation" category. The sector is highly energy-intensive, with consumption typically measured by the energy required per ton-mile of transport work. Table 2 provides the energy intensity associated with the sector.

Refer to page 50 in the financial statements for the net revenue figure used in the energy intensity calculation.

TABLE I: ENERGY CONSUMPTION AND MIX

| ENERGY CONSUMPTION AND MIX | 2024 | 2023 | 2022 |
|---|---|---|---|
| 1. Fuel consumption from coal and coal products (MWh) | - | - | - |
| 2. Fuel consumption from crude oil and petroleum products (MWh) | 5,397,974.42 | 6,064,065.98 | 6,579,334.30 |
| 3. Fuel consumption from natural gas (MWh) | - | - | - |
| 4. Fuel consumption from other fossil sources (MWh) | - | - | - |
| 5. Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh) | 71.39 | 55.27 | 22.46 |
| 6. Total fossil energy consumption (MWh) | 5,398,045.81 | 6,064,121.25 | 6,579,356.86 |
| Share of fossil sources in total energy consumption (%) | 100.00 | 100.00 | 100.00 |
| 7. Consumption from nuclear sources (MWh) | 2.93 | 2.98 | 0.44 |
| Share of consumption from nuclear sources (%) | - | - | - |
| 8. Fuel consumption from renewable sources (MWh) | - | - | - |
| 9. Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh) | 2.18 | 1.50 | 1.76 |
| 10. Consumption of self-generated non-fuel renewable energy (MWh) | - | - | - |
| 11. Total renewable energy consumption (MWh) | 2.18 | 1.50 | 1.76 |
| Share of renewable sources in total energy consumption (%) | - | - | - |
| **Total energy consumption (MWh)** | **5,398,050.93** | **6,064,125.73** | **6,579,359.06** |
| **Total energy consumption from activities in high climate impact sectors (MWh)** | **5,398,050.93** | **6,064,125.73** | **6,579,359.06** |

TABLE II

| ENERGY INTENSITY PER NET REVENUE | 2024 | 2023 | 2022 | % CHANGE BETWEEN 2023/2024 |
|---|---|---|---|---|
| Total energy consumption from activities in high climate impact sectors per net revenue (MWh/monetary unit) | 9.98 | 8.53 | 10.67 | 17.06 |

## E1-6 Gross Scopes 1, 2 and 3 and Total GHG emissions

MPCC's total GHG emissions have decreased since last year, owing to a reduction in fuel consumption, fleet optimization measures, and increased energy efficiency initiatives. The decrease in total GHG emissions amounted to 10.02% compared to 2023, demonstrating MPCC's ongoing efforts to decarbonize its operations.

MPCC's GHG emissions intensity decreased by 18.33%, reflecting improved energy efficiency measures and lower emissions per unit of output.

Details regarding the methodologies, key assumptions, and emissions factors applied in calculating or measuring GHG emissions are outlined in E1 accounting principles.

See page 50 in the financial statements for the net revenue figure used for the above calculation.

TABLE III: GROSS SCOPES 1, 2 AND 3 AND TOTAL GHG EMISSIONS

| MPCC'S GHG EMISSIONS FOOTPRINT IN 2024 | 2024 | 2023 | 2022 | % N / N-1 |
|---|---|---|---|---|
| Well-to-Wake GHG emissions intensity | 14.60 | 15.18 | 17.43 | (3.82%) |
| **SCOPE 1 GHG EMISSIONS** | | | | |
| Gross Scope 1 GHG emissions ($tCO_2eq$) | 1,508,009.7 | 1,700,026.7 | 1,845,726.6 | (11.29%) |
| % of Scope 1 GHG emissions from regulated emission trading schemes | - | - | - | - |
| **SCOPE 2 GHG EMISSIONS** | | | | |
| Gross location-based Scope 2 GHG emissions ($tCO_2eq$) | 27.3 | 26.4 | 5.89 | 3.41% |
| Gross market-based Scope 2 GHG emissions ($tCO_2eq$) | 12.3 | 11.71 | 4.59 | 5.04% |
| **SIGNIFICANT SCOPE 3 GHG EMISSIONS** | | | | |
| Scope 3 Cat 1 – Purchased G&S | 22,661.5 | 11,104.5 | 52,686.4 | 104.07% |
| Scope 3 Cat 2 – Capital Goods | 45,576.3 | 43,163.3 | 99,877.8 | 5.59% |
| Scope 3 Cat 3 – Fuel & Energy | 325,612.4 | 358,609.0 | 559,197.0 | (10.2%) |
| Scope 3 Cat 4 – Upstream trans & dis | 498.0 | 1,591.6 | 5,231.8 | (68.71%) |
| Scope 3 Cat 5 – Waste generated in operations | 263.5 | 296.1 | 326.4 | (11.01%) |
| Scope 3 Cat 6 – Business Travel | 763.1 | 630.4 | 9,158.0 | 21.05% |
| Scope 3 Cat 7 – Employee Commuting | - | - | 11.4 | N/A |
| Total Gross indirect (scope 3) GHG emissions ($tCO_2eq$) | 395,374.8 | 415,395.0 | 726,488.8 | (5.68%) |
| **TOTAL GHG EMISSIONS** | | | | |
| Total GHG emissions (location-based) ($tCO_2eq$) | 1,903,397.4 | 2,115,433.4 | 2,572,222.0 | (10.02%) |
| Total GHG emissions (market-based) ($tCO_2eq$) | 1,903,411.8 | 2,115,448.1 | 2,572,221.3 | |

TABLE IV: GHG INTENSITY BASED ON NET REVENUE

| GHG INTENSITY PER NET REVENUE | COMPARATIVE (N) | % N / N-1 | TOTAL GHG EMISSIONS PER NET REVENUE ($TCO_2EQ/USD$) |
|---|---|---|---|
| Total GHG emissions (location-based) per net revenue ($tCO_2eq$/Monetary unit) | 3.519232 | 18.33% | 2.974038 |
| Total GHG emissions (market-based) per net revenue ($tCO_2eq$/Monetary unit) | 3.519232 | 18.33% | 2.974038 |

# E1 Accounting principles

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| All | | | All metrics cover the reporting period 1. January 2024–31. December 2024. |
| E1-3 | | Actions related to climate change mitigation | |
| E1-4 | AR 25a | Targets related to climate change mitigation – Representativeness of baseline value | In September 2024, MPCC appointed the American Bureau of Shipping (ABS) to independently calculate and certify the company's 2008 GHG Emission baseline. The selection of 2008 as the baseline year aligns with the International Maritime Organization's (IMO) revised 2023 GHG Strategy, which uses this year as a reference point for all sectoral climate mitigation targets and efforts.<br><br>The calculation of the 2008 baseline followed the Global Logistics Emission Council (GLEC) Framework, version 3. ABS used operational data from 2018 to 2024 to extrapolate the fleet's carbon intensity for 2008. This ensures the baseline accurately reflects MPC Container Ships' historical activities, independently verified and certified by a third-party expert.<br><br>Both the Company's 2030 and 2050 emission reduction targets, along with the baseline, are calculated on a well-to-wake basis, reinforcing a comprehensive approach to emissions accountability |
| E1-4 | 81b | Targets related to climate change mitigation – effectiveness of policies and actions | MPCC tracks the effectiveness of its policies and actions through a comprehensive monitoring, reporting, and verification (MRV) system. This process complies with regulatory frameworks such as the EU-MRV and IMO DCS while enabling continuous performance tracking to meet the company's 2030 and 2050 GHG intensity targets.<br><br>Key indicators, including the Annual Efficiency Ratio (AER) and fuel consumption metrics, are monitored daily to assess fleet-wide GHG intensity. Progress is measured against the baseline fleet average GHG intensity from 2008. This system ensures ongoing evaluation and optimization to support long-term climate objectives. |

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| E1-4 | 80i | Targets related to climate change mitigation – changes in targets | MPCC has revised its 2030 GHG intensity target, aiming for a 45% reduction by 2030 from a 2008 baseline and net zero by 2050. This surpasses the IMO's carbon intensity trajectory. The update involves shifting from an industry average to an individual baseline developed with ABS, better reflecting company performance. It also aligns with the Global Logistics Emission Council (GLEC) Framework Version 3 and incorporates new assessments of renewable fuel availability, retrofit potential, and market trends.<br><br>Key metrics include the Fleet-wide Annual Efficiency Ratio (AER), monitored via a system compliant with EU MRV and IMO DCS standards. Assumptions focus on greater renewable fuel adoption and market support, while external factors like technological advancements and market conditions are acknowledged. Enhanced monitoring ensures precise tracking of energy efficiency and GHG intensity |
| E1-4 | AR 26 & 27 | Targets related to climate change mitigation – reference to sector-specific pathways | MPCC has revised its 2030 GHG intensity target to achieve a 45% reduction from a 2008 baseline, on a well-to-wake basis, exceeding the ambition level of the International Maritime Organization's (IMO) 2023 GHG Strategy. The adjustment aligns with the Paris Agreement's 1.5°C target, as the IMO's 2023 GHG Strategy itself is designed to support global temperature goals.<br><br>The IMO's 2023 GHG Strategy supports net-zero emissions by around 2050, with milestones to reduce carbon intensity by at least 45% by 2030 and total GHG emissions by at least 20% relative to 2008 levels. By 2040, it targets a 70% reduction in total GHG emissions and aspires to reach 80%. These efforts focus on transitioning to low- and zero-carbon fuels, enhancing energy efficiency, and fostering technological innovation to ensure international shipping contributes to global climate objectives equitably.<br><br>MPCC's update involves using an individual baseline developed and verified by ABS, improving accuracy in tracking progress. It aligns with the Global Logistics Emission Council (GLEC) Framework Version 3 and considers renewable fuel availability, retrofit potential, and industry trends. The Company's Annual Efficiency Ratio (AER) metric is monitored under a system compliant with EU MRV and IMO DCS standards, supported by assumptions on the growing adoption of renewable fuels |

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| E1-5 | 37-43 | Total energy consumption in own operations | Data regarding energy consumption is generated from the Blue Tracker reporting software. Data is registered daily in the system and transferred and processed within the system, for calculation and verification.<br><br>MPCC calculates its total energy consumption by aggregating data from two primary sources: offshore energy consumption from vessel operations and onshore energy consumption from office activities. The sum of these two sources provides total energy consumption for the Company.<br><br>MPCC's Scope 3 emissions include indirect emissions from the supply chain and other business activities, specifically:<br>+ Fuel- and energy-related activities (extraction, refining, and transport of fuels used in vessel operations).<br>+ Business travel and employee commuting, though minimal compared to operational emission<br><br>MPCC's fuel consumption data primarily relates to fossil energy sources, with crude oil and petroleum products forming the dominant share of its energy mix.<br><br>Conversion Methodology:<br><br>To ensure consistency and comparability across reporting periods, MPCC converts energy consumption data from gigajoules (GJ) to megawatt-hours (MWh) using the standard conversion factor: 1 GJ = 0.277778 MWh.<br><br>Energy consumption data for 2023 and 2022 were originally recorded in GJ and converted to MWh using this factor to align with the reporting format adopted for 2024. This conversion ensures that all reporting years are presented in the same unit of measure.<br><br>MPCC calculates energy intensity per net revenue in accordance with ESRS E1-5 AR36, which requires the ratio to be determined by dividing total energy consumption (in MWh) by net revenue (in USD). Total Energy Consumption is measured in megawatt-hours (MWh) and derived from MPCC's vessel operations and office activities.<br><br>The purchased electricity, heat, steam and cooling energy has been split into multiple energy sources (Renewable, fossil-fuel and nuclear) depending on the country grid where MPCC operates offices (Germany, Norway and Netherlands) using AIB residual mixes % split.<br><br>The energy consumption and mix data is not validated by an external body other than the assurance provider. The methodology used for data conversion follows widely recognized energy measurement standards. |

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| E1-6 | | Gross scopes 1, 2, 3 and total GJG emissions | MPCC reports gross scope 1, scope 2 and scope 3 GHG emissions to assess its carbon footprint from direct and indirect sources.<br><br>+ Scope 1 emissions are calculated based on fuel consumption data from vessel operations, applying emission factors in accordance with IMO and EU ETS guidelines.<br>+ Scope 2 emissions are derived from electricity and heating consumption in MPCC's onshore operations, using location-based emission factors.<br>+ Scope 3 emissions cover indirect emissions from upstream and downstream activities, including purchased goods and services, capital goods, and fuel and energy-related activities. For the years reported in the table, Scope 3 emissions were calculated using a spend-based approach, utilizing supplier-specific data and recognized industry benchmarks. MPCC does not report emissions from employee commuting (Scope 3, Category 7) as an assessment in 2022 determined they were negligible. This approach is in accordance with the GHG protocol, and the category is excluded from MPCC's emissions inventory.<br><br>MPCC calculates GHG intensity per net revenue in line with ESRS E1-5 AR36, dividing total GHG emissions ($tCO_2eq$) by net revenue (USD) to assess emissions efficiency relative to financial performance.<br><br>There were no changes in the calculation methodology during the reporting year.<br><br>This metric is not validated by an external body, but the methodology aligns with recognized emissions reporting frameworks |

# E2 POLLUTION

MPCC is committed to managing pollution responsibly and aligning its operations with internationally recognized environmental standards. The Company's approach prioritizes compliance with frameworks such as MARPOL Annex VI and the IMO Ballast Water Management Guideline, supported by ISO-certified environmental management practices.

Targeted measures are implemented to mitigate risks connected to air and water pollution, including emission control systems, hazardous material inventories, and ongoing performance monitoring. These efforts reflect broader commitments to sustainable shipping practices while maintaining compliance with evolving regulatory requirements.

### KPIs

+ Establish Baseline and Action Plan for Pollution Mitigation

### Relevant Policies

+ Sustainability policy
+ Environmental policy

### Reporting Standards Used

+ ESRS E2

### Relevant SDGs

# Material Impacts, Risks and Opportunities

See ESRS 2, page 137, for a description of the resilience assessment of MPCC's strategy and business model in relation to pollution.

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Air pollutants from own operations | Actual negative impact | Own operations | Short-term |
| Pollution from antifouling measures | Actual negative impact | Own operations | Short-term |
| Improperly managed hazardous waste from ship recycling | Actual negative impact | Downstream | Medium-term |
| Increasing regulatory pressure to reduce air pollutant emissions | Risk | Own operations | Medium-term |
| Whistleblower case for deliberate pollution of water in US territory | Risk | Own operations | Medium-term |
| Non-compliance with EU ship recycling rules on inventories of hazardous substances | Risk | Downstream | Medium-term |

The double materiality assessment identified the following material impacts and risks related to pollution. No material opportunities were identified in the assessment.

## Material impacts

### Air pollutants from own operations

MPCC has identified an actual negative impact on the environment stemming from various air pollutants emitted during its operations. These pollutants include nitrogen oxides ($NO_x$), sulfur oxides ($SO_x$), particulate matter (PM), and volatile organic compounds (VOCs). Emissions of these substances contribute to air pollution, smog formation, and acid rain, which could damage ecosystems, reduce air quality, and pose health risks to crew members and nearby communities. Particulate matter can contaminate marine ecosystems through deposition and causing bioaccumulation of toxins. Collectively, these pollutants affect ecosystem balance, aquatic life, vegetation, and human health.

As part of its efforts to mitigate the impact, MPCC monitors $NO_x$ and $SO_x$ emissions in compliance with MARPOL Annex VI. Key mitigation measures include the use of exhaust gas cleaning systems (EGCS) on vessels to reduce $SO_x$ emissions. MPCC complies with Emission Control Area (ECA) regulations by using low-sulphur marine diesel oil.

### Pollution from antifouling

MPCC uses antifouling in its operations to deter the growth of marine organisms on the hull of the vessels. The antifouling paint currently in use contains substances that can leach into the marine environment over time, potentially contaminating sediments and aquatic life. This could impact the health of marine organisms and the local water quality. To mitigate this impact, MPCC adheres to the IMO Antifouling Systems (AFS) Convention, which prohibits harmful substances like tribyltin (TBT).

The Company takes part in industry initiatives like Eyesea, which focuses on pollution tracking and reduction, to have a positive impact on the environment and manage related risks. The vessels utilize low-friction silicon-based coatings to reduce fuel consumption, enhancing overall efficiency while lowering emissions but especially to minimize the impact of the coating on the marine environment. These efforts are reflected in MPCC's long-term strategy focused on pollution control, as described in E2-2 below.

### Improperly managed hazardous waste from ship recycling

Improperly managed hazardous waste from ship recycling, including materials like asbestos, heavy metals, and toxic chemicals, poses risks to both the environment and public health. If not properly handled, these hazardous substances can contaminate soil, water, and air. Furthermore, when materials containing toxins, such as lead and mercury are sold for reuse or upcycling without adequate safeguards, they can cause long-term harm to ecosystems and human well-being.

While MPCC has not yet recycled a vessel, this impact is concentrated in its downstream value chain, during the end-of-life phase of vessels when they are dismantled. The risk is expected to materialize in the medium term if not managed effectively.

MPCC addresses these risks through the implementation of policies and the maintenance of detailed inventories of hazardous materials for every vessel. This approach ensures greater control over the handling, disposal, and potential recycling of hazardous substances. These measures form a core part of MPCC's strategic approach to control and reduce its pollution-related impacts.

## Material risks

### Increasing regulatory pressure to reduce air pollutant emissions

MPCC faces a material risk associated with increasingly stringent regulations targeting air pollutants, particularly $NO_x$ and $SO_x$ emissions. Compliance requirements for $SO_x$ include the installation of exhaust gas cleaning systems (EGCS) or the use of low-sulfur marine diesel oil. $NO_x$ regulations primarily affect newbuilds by mandating advanced engine technologies.

These regulations, driving higher operating costs across the shipping industry, pose a direct risk to MPCC's own operations, with potential costs related to fleet retrofitting, compliance monitoring and operational adjustments in the medium term.

Stringent regulations could have substantial effects on the Company's business model by driving investments in fleet retrofitting, fuel transitions and advanced compliance measures. MPCC actively monitors regulatory developments and leverages its sustainability and regulatory affairs functions.

To date, MPCC has not experienced financial effects from this risk.

### Case of a whistleblower showing deliberate pollution of water in U.S. territory

MPCC faces a material risk associated with deliberate water pollution occurring on one of its vessels in U.S. territory, particularly if reported through a whistleblower. In such a case, the Company would be subject to financial penalties, including fines related to the whistleblower incident and potential probation in U.S. waters. This poses a direct threat to MPCC's own operations and could result in operational disruptions and reputational damage in the medium-term.

Currently, no specific mitigating actions or strategies have been put in place to address the risk. Pollution of water is managed through compliance with and implementation of MARPOL, and its associated international rules and regulations as a key component of the Company's sustainability strategy. To date, MPCC's financial metrics remain unaffected by this risk.

### Non-compliance with EU Ship recycling rules on inventories of hazardous substances

Non-compliance with the EU Ship Recycling Regulation regarding inventories of hazardous substances could pose a financial risk for MPCC in the medium term. These repercussions may include fines, penalties, costs associated with corrective actions, potential legal fees, and damage to the Company's reputation. In addition, failure to comply could lead to the inability to operate within EU waters, affecting both business opportunities and revenue streams. The risk is concentrated in MPCC's downstream value chain, particularly during the end-of-life phase.

MPCC mitigates risks related to ship dismantling and hazardous waste through compliance with international regulatory frameworks such as the Hong Kong Convention, as well as maintaining inventories of hazardous materials (IHM) in line with EU Ship Recycling Regulations. Non-compliance with EU Ship Recycling Regulation could have substantial effects on MPCC's business model by causing operational restrictions within the EU. There has been no material financial impact on MPCC from this risk to this date.

# Impacts, Risk & Opportunity Management

## E2-1 Policies related to pollution

### MPCC's Environmental Policy

The Environmental Policy sets out MPCC's commitment to prevent and control pollution, driving its approach to manage impacts and risks associated with air and water pollution.

The policy emphasizes the optimization of vessel energy efficiency performance, to reduce GHG emissions as well as $NO_x$ and $SO_x$ emissions, alongside the continuous exploration of viable technologies to minimize air pollution. Additionally, the policy involves key initiatives to promote the use of environmentally friendly technologies aimed at mitigating marine pollution, such as advanced antifouling measures and the proper handling of harmful discharges such as ballast water.

The policy enforces a zero-discharge objective to prevent water contamination and requires strict management of hazardous materials, including those generated during ship recycling, Compliance with international environmental standards is a core principle, mandating that technical managers operate under ISO 14001-certified environmental management systems. Furthermore, MPCC adopts a proactive stance towards incident prevention and risk mitigation by identifying, minimizing, and monitoring environmental risks to limit potential adverse impacts on people and ecosystems in the event of incidents.

Currently, the policy does not include provisions for the substitution or minimization of substances of concern, nor the phasing out of substances classified as very high concern. Despite this, MPCC maintains compliance with international frameworks such as the IMO's MARPOL Convention, which regulates key pollutants including sulfur, nitrogen oxides, and oil discharges. Through its technical managers, the Company ensures full adherence to these requirements, supporting its ongoing commitment to pollution prevention and the responsible management of hazardous substances throughout its operations.

See E1-2 for more information on the Environmental Policy.

# Metrics and Targets

## E2-2 Actions and resources related to pollution

MPCC has not yet formalized an action plan relating to pollution, as foundational assessments are still underway. Establishing an action plan requires a comprehensive baseline analysis of pollution sources, emissions, and associated risks. As regulatory expectations become clearer and a unified methodology for data collection advances, MPCC will be better positioned to develop a robust baseline and implement targeted measures to address its pollution impact.

Please refer to IRO-1 above for disclosure of the Company's actions to prevent and mitigate its pollution-related material impacts and risks.

## E2-3 Targets related to pollution

MPCC has not set targets for pollution. This is due to constraints in a unified methodology for data collection and availability as well as standardized monitoring protocols, which have hindered the development of reliable and measurable targets.

In 2024, MPCC has focused its efforts on pollutants subject to established regulatory frameworks, including $NO_x$, and $SO_x$. Research on other air pollutants remains underdeveloped at this point, with thresholds for many substances yet to be defined under regulatory frameworks such as the EU's REACH and IMO conventions. As monitoring capabilities and regulatory standards evolve, MPCC intends to set data-driven, quantitative targets for a broader range of air pollutants.

To facilitate future target development, MPCC intends to establish a workgroup over the next year to collaborate with industry peers and technical managers. This initiative will prioritize the identification of relevant pollutants, compilation of scientific research, and evaluation of monitoring systems to enhance data collection and compliance capabilities.

## E2-4 Pollution of air, water and soil

Table I records relevant pollutants disaggregated by pollution to air, water and soil. The pollutants reported are those that meet or exceed the threshold values outlined in Annex II of Regulation (EC) No 166/2006.

**TABLE I: POLLUTION TO AIR, WATER, AND SOIL**

### Releases to Air

| POLLUTANT | 2024 | 2023 | 2022 | % CHANGE (2024 VS. 2023) |
|---|---|---|---|---|
| Sulfur oxides ($SO_x$) | 3,997.50 | 4,586.37 | 4,837.24 | (-12.84%) |
| Nitrogen oxides ($NO_x$) | 38,002.26 | 44,799.83 | 47,924.00 | (-15.17%) |
| Particulate matter (PM) | 1,716.00 | 1,971.07 | 2,115.55 | (-12.94%) |

For disclosure on the methodologies and key assumptions related to E2 metrics, see page 157 in the E2 accounting policies.

Emissions of $SO_x$ and PM have been reported since 2022, while $NO_x$ reporting commenced in 2021. From 2023 to 2024, $SO_x$ emissions decreased by approximately 13%, $NO_x$ emissions declined by 15.17%, and PM emissions were reduced by 12.94%. period. MPCC refrains from using microplastics in its operations and does not generate them. Any incidental presence is considered negligible and not currently measurable.

### Pollution of water

MPCC does not currently measure or track pollutants emitted to water. However, emissions from scrubber EGCS wash water and ballast water are regulated under MARPOL and the IMO Ballast Water Management Convention. EGCS discharges comply with IMO Resolution MEPC.259(68), which sets limits for pH, PAHs, nitrates, and turbidity. While compliance is ensured through onboard systems, data accessibility for reporting remains limited.

MPCC monitors its pollution-related policies through established compliance processes, including MARPOL Annex VI, the EU Ship Recycling Regulation, and fuel consumption monitoring under IMO DCS and EU MRV. $SO_x$ and $NO_x$ emissions are estimated based on fuel and energy consumption data, while $NO_x$ levels are also verified through machinery certificates. Compliance is validated through audits, and pollution incidents are recorded and analyzed for continuous improvement.

## E2-5 Substances of concern and substances of very high concern

MPCC does not currently possess data related to the production, use, distribution, or emissions of substances of concern or substances of very high concern.

## E2-6 Anticipated financial effects from pollution-related IROs

MPCC has chosen to apply the phase-in option to omit the financial effects of material pollution-related risks and opportunities.

# E2 Accounting principles

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| All | | | All metrics cover the reporting period 1. January 2024–31. December 2024. |
| E2-4 | 30b | Pollution to air, water and soil – measurement methodology | Under the EU MRV and IMO DCS frameworks, emissions of sulfur oxides ($SO_x$) and nitrogen oxides ($NO_x$) are not directly measured but are calculated based on fuel consumption. The calculations use sulfur and nitrogen oxide factors, which are derived from the type and quantity of fuel consumed. The engine's design characteristics play a critical role in determining $NO_x$ emissions, with operational changes having limited impact on the final $NO_x$ output. MPCC ensures compliance by maintaining accurate fuel records, engine certifications, and operational logs, which collectively demonstrate adherence to $SO_x$ and $NO_x$ emissions regulations.<br><br>The pollution-related data is not validated by an external body. |
| E2-4 | 30c | Pollution to air, water and soil – data collection for pollution-related reporting | The collection of data for pollution-related accounting and reporting, particularly for $SO_x$, $NO_x$, and particulate matter (PM), involves several key sources and processes. Data is gathered from onboard monitoring systems, engine manufacturers, and fuel records, such as bunker delivery notes (BDNs), which provide details on fuel type, quantity, and sulfur content. Operational parameters, including distance travelled, engine load, and speed, are logged alongside engine-specific emission factors for each pollutant.<br><br>Fuel consumption is reported daily and aggregated annually.<br><br>This data undergoes verification by Recognized Organizations before being submitted to the relevant flag state. $SO_x$ emissions are calculated using fuel sulfur content and consumption data, while $NO_x$ is determined through engine-specific technical information. 2023 and 2024 $SO_x$, $NO_x$ and PM emissions generated by LFO have been estimated based on the HFO and MDO fuel consumption. 2023 values have been amended to reflect this methodological change. PM emissions are estimated using emission factors related to both fuel type and engine characteristics. Compliance is monitored using IMO DCS-compliant software.<br><br>Additionally, vessels submit regular reports on voyage details (arrival, departure, and noon reports), as well as the mass and specification of fuels bunkered and consumed, via ship-to-shore reporting systems. Data is reviewed by the technical managers' performance departments and classification societies to ensure accuracy and regulatory compliance. |

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| E2-4 | 31 | Pollution to air, water and soil – use of estimated emissions methodology | MPCC measures its reported emissions using estimates based on emission factors rather than direct measurement technologies. The approach is driven by several key considerations. First, emission factors are a more cost-effective solution compared to the installation and maintenance of Continuous Emission Monitoring Systems (CEMS) or other direct measurement methods. This allows the Company to meet regulatory requirements without incurring significant financial burdens.<br><br>Second, emission factors are straightforward to apply, enabling shipowners to calculate emissions using well-established formulas that correlate fuel consumption with engine characteristics. Regulatory bodies, such as the IMO and EU, have standardized these emission factors, promoting consistency in emissions reporting across the shipping industry.<br><br>Lastly, the methodology aligns with international and regional regulatory frameworks, including MARPOL Annex VI, IMO DCS and EU MRV, which recognize and accept emission factor-based calculations for compliance purposes. This alignment makes the use of estimates a practical and compliant option for MPCC. The pollution-related data is currently validated internally without additional verification from an external body beyond the assurance provider. |
| E1-4 | AR 26 & 27 | Targets related to climate change mitigation – reference to sector-specific pathways | MPCC has revised its 2030 GHG intensity target to achieve a 45% reduction from a 2008 baseline, on a well-to-wake basis, exceeding the ambition level of the International Maritime Organization's (IMO) 2023 GHG Strategy. The adjustment aligns with the Paris Agreement's 1.5°C target, as the IMO's 2023 GHG Strategy itself is designed to support global temperature goals.<br><br>The IMO's 2023 GHG Strategy supports net-zero emissions by around 2050, with milestones to reduce carbon intensity by at least 45% by 2030 and total GHG emissions by at least 20% relative to 2008 levels. By 2040, it targets a 70% reduction in total GHG emissions and aspires to reach 80%. These efforts focus on transitioning to low- and zero-carbon fuels, enhancing energy efficiency, and fostering technological innovation to ensure international shipping contributes to global climate objectives equitably.<br><br>MPCC's update involves using an individual baseline developed and verified by ABS, improving accuracy in tracking progress. It aligns with the Global Logistics Emission Council (GLEC) Framework Version 3 and considers renewable fuel availability, retrofit potential, and industry trends. The Company's Annual Efficiency Ratio (AER) metric is monitored under a system compliant with EU MRV and IMO DCS standards, supported by assumptions on the growing adoption of renewable fuels |

# E4 BIODIVERSITY AND ECOSYSTEMS

The shipping industry has a broad ecological footprint and involves multiple interactions and impacts on marine biodiversity. As part of the green transition, MPCC strive to achieve a balance between climate action and nature conservation, both of which are fundamental to a sustainable future. As a container shipping company managing a substantial portfolio of physical assets and relying on the marine environment for transportation, MPCC recognizes its responsibility to mitigate its ecological impact. The marine ecosystem is highly sensitive, and preserving its delicate balance is a key priority for us.

To achieve this, MPCC has implemented robust policies across all operations and the value chain to address material biodiversity impacts. The sustainability policy emphasizes the importance of integrating long-term ecological considerations into business decisions, ensuring that its activities align with environmental stewardship. Additionally, the environmental policy commits us to identifying, avoiding, minimizing, managing, and monitoring environmental impacts. Through these measures, the Company strives to reduce its footprint and contribute to the protection of marine biodiversity.

### KPIs

+ Formulate target for MPCC connected to biodiversity impact.

### Relevant Policies

+ Sustainability policy
+ Environmental policy

### Reporting Standards Used

+ ESRS E4

### Relevant SDGs

# Material Impacts, Risks and Opportunities

See ESRS 2, page 137, for a description of the resilience assessment of MPCC's strategy and business model in relation to pollution.

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Biofouling on the hull of vessel | Actual negative impact | Own operations | Short-term |
| GHG emissions driving biodiversity loss | Actual negative impact | Own operations | Long-term |

The DMA identified the following climate-related impacts related to biodiversity and ecosystems:

### Direct impact drivers of biodiversity loss – Biofouling on the side of the vessel

Biofouling can introduce invasive species into new ecosystems, potentially disrupting biodiversity. Non-native species transported in this manner can outcompete native species, destabilize local ecosystems, and cause long-term damage to marine biodiversity.

Tied to the Company's own operations, the impact presents a risk in both the short and mid-term, with regulatory scrutiny expected to intensify over time. MPCC mitigates this risk through strategic responses embedded in its business model. Key measures include:

+ Use of antifouling technologies: Application of silicon-based or other protective coatings to vessel hulls to prevent organism accumulation.
+ Regular hull maintenance: Ensuring vessel surfaces are cleaned and maintained to optimize performance and prevent biofouling.

### GHG emissions driving biodiversity loss

MPCC's operations, including fuel consumption across its fleet, contribute to GHG emissions, which are a major driver of climate change. This, in turn, leads to biodiversity loss by altering climate patterns, increasing extreme weather events, and disrupting ecosystems. The impact manifests through habitat destruction, decreased food availability, and heightened stress on species, ultimately threatening the survival of many forms of biodiversity.

This actual impact is closely tied to MPCC's business model due to the energy-intensive nature of container shipping. It is considered both a mid-term and long-term risk, especially as international environmental standards and GHG pricing mechanisms become stricter. MPCC addresses this challenge through the following strategies:

+ Fleet energy efficiency upgrades: Implementing Energy Saving Technology (EST) and reviewing SEEMP to continually monitor and optimize vessel performance.
+ Adoption of alternative fuels: Investing in dual-fuel vessels capable of operating on low-carbon fuels such as green methanol, which aligns with upcoming regulations like the FuelEU Maritime Directive.
+ Decarbonization strategy: Reducing overall emissions through continuous technological improvements, contributing to MPCC's efforts to maintain compliance and enhance sustainability credentials.

# Impacts, Risk & Opportunity Management

## E4-2 Policies related to biodiversity and ecosystems

Biodiversity and ecosystem considerations are integrated into MPCC's Environmental Policy and Sustainability Policy.

+ The Environmental Policy outlines MPCC's approach to biofouling management, including the use of anti-fouling coatings and regular hull cleaning to reduce biofouling and limit the spread of invasive species. Pollution control measures align with MARPOL requirements to minimize waterborne contaminants.
+ The Sustainability Policy embeds ecosystem protection into decision-making, promoting vessel efficiency improvements and compliance with environmental regulations.

# Metrics and Targets

## E4-3 Actions and resources related to biodiversity and ecosystems

MPCC has implemented several actions to mitigate biodiversity risks related to biofouling. Biofouling management includes the application of anti-fouling coatings and regular hull cleanings to prevent the accumulation of marine organisms on vessel hulls, thereby reducing the unintentional transfer of invasive species. Additionally, MPCC's energy efficiency initiatives, as outlined in E1-2, contribute to lowering GHG emissions and reducing underwater radiated noise, aligning with IMO guidelines aimed at minimizing disturbances to marine life.

These measures are embedded into broader operational practices, with dedicated resources allocated to anti-fouling maintenance and ballast water treatment system (BWTS) implementation.

## E4-4 Targets and E4-5 Impact metrics related to biodiversity and ecosystems

MPCC has not yet established formal, science-based targets or metrics for biodiversity and ecosystems, due to the lack of standardized benchmarks and methodologies for monitoring, reporting, and verification (MRV). However, biodiversity protection is embedded in its broader environmental commitments:

+ MPCC's GHG emissions intensity target indirectly supports biodiversity by mitigating climate-related habitat degradation.
+ MARPOL-compliant waste management practices, including strict controls on garbage and sewage discharge, contribute to pollution reduction in marine ecosystems
+ Biofouling management measures help prevent the unintentional transport of invasive species across regions.

MPCC continues to enhance its internal monitoring and reporting practices to better assess biodiversity impacts and comply with regulatory expectations.

# E5 RESOURCE USE AND CIRCULAR ECONOMY

MPCC is dedicated to optimizing resource utilization to minimize environmental impact and promote circular economy principles throughout its operations. The Company depends on essential resources such as marine fuel oil, steel, and protective coatings to maintain and operate its fleet. To ensure continuous improvements in resource efficiency and responsible management, MPCC has implemented targeted policies and strategies aimed at enhancing fuel efficiency, extending the lifespan of critical materials, and minimizing waste.

## KPIs

+ Track and optimize fuel consumption through IMO DCS and EU-MRV

## Relevant Policies

+ Sustainability policy
+ Environmental policy

## Reporting Standards Used

+ ESRS E5

## Relevant SDGs

# Material Impacts, Risks and Opportunities

See ESRS 2, page 137, for a description of the resilience assessment of MPCC's strategy and business model in relation to climate change.

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Resource inflows – high intensity resource consumption | Actual negative impact | Upstream | Short-term |
| Resource inflows – paints used for hull | Actual negative impact | Own operations | Medium-term |

The DMA identified two impacts connected to its resource use and circular economy. No material risks and opportunities were identified through the assessment.

### Resource inflows – High-intensity resource consumption

MPCC relies heavily on fossil fuels and steel to sustain its operations. Fossil fuels are critical for vessel propulsion, while steel is essential for the construction, maintenance, and retrofitting of ships. These impacts originate primarily in the raw material extraction and production stages of the upstream supply chain and causing negative environmental impacts.

Fossil fuel extraction and consumption deplete non-renewable sources and contribute to GHG emissions. Steel production is energy and water-intensive, generating air and water pollution through mining and processing activities.

These impacts are closely tied to MPCC's business model and long-term operational needs. Fossil fuels will remain necessary for vessel operations in the foreseeable future due to the lack of viable large-scale availability of renewable fuels. Similarly, steel demand will persist as it is fundamental to maintaining fleet performance and safety.

MPCC integrates efficiency measures to optimize fuel use and maintain vessels effectively. Responsible sourcing principles are embedded in the Business Partner Guidelines, while sourcing decisions are largely managed by its charterers and technical managers.

### Resource inflows – Paints used for hull

MPCC relies on protective hull coatings to prevent corrosion and maintain the long-term usability of its vessels. Without these coatings, ships would rapidly deteriorate due to constant exposure to harsh marine conditions, making the application of paints essential for maintaining operational efficiency. This impact is concentrated within MPCC's own operations and is directly tied to vessel maintenance activities.

The use of paints has potential negative impacts on the environment, particularly through water pollution caused by chemical substances in the paint. These impacts arise from the potential leaching of harmful materials into the marine environment if not carefully managed. Although MPCC is unable to eliminate the use of paints due to operational needs, the Company seeks to reduce the impact by partnering with key suppliers which developed and offer environmentally preferable paints.

# Impact, Risk and Opportunity Management

## E5-1 Policies related to resource use and circular economy

The following policies outline the Company's approach to managing resource use and circular economy. Together, the policies lay the foundation for circular economy practices by focusing on resource optimization, waste reduction, and supplier engagement to foster sustainability throughout MPCC's maritime operations. The Compliance Officer holds the highest responsibility for overseeing and ensuring the implementation of these policies.

### Sustainability Policy

The Sustainability Policy addresses resource use and circular economy by embedding principles aimed at minimizing resource consumption and promoting sustainable practices across MPCC's operations and value chain. The Sustainability Policy, fully outlined in E1-2, includes commitments to balance economic and ecological factors in decision-making and promote responsible sourcing. These measures are particularly relevant for mitigating the high-intensity consumption of raw materials such as steel and fossil fuels, which drive both resource depletion and pollution.

### The Environmental Policy

The Environmental Policy outlines measures to mitigate resource-intensive practices by setting clear objectives for environmental performance. This includes technological upgrades, energy efficiency measures, and the enhancement of Ship Energy Efficiency Management Plans. Through these measures, the policy relates to the impact of high fossil fuel use by improving fuel efficiency and reducing emissions and operational pollutants. Regarding circular economy, the policy encourages the adoption and diffusion of environmentally friendly technologies, which is essential for minimizing waste and pollution related to steel and hull paints.

### The Business Partner Guideline

The guideline defines clear expectations for suppliers and business partners to adopt environmentally friendly practices, including pollution control and the management of hazardous substances. Partners are required to comply with relevant environmental and safety laws and take measures to minimize pollution risks. In relation to paints used for hull protection, the guideline mandates that partners manage hazardous and dangerous substances responsibly and implement measures to minimize and prevent pollution risk.

The Business Partner Guideline applies to all business partners within MPCC's operations, including suppliers, contractors, and other stakeholders engaged in any business dealings with the company. It covers activities across both upstream and downstream aspects of the value chain.

### The Sustainable Procurement Policy

The policy reflects the Company's commitment to collaborating with suppliers that adopt sustainable practices, prioritizing those utilizing recycled materials to reduce the Company's dependence on virgin resources. By doing so, the policy addresses the impact of high-intensity raw material consumption within the supply chain.

The policy governs all procurement activities across MPCC and its subsidiaries, encompassing employees, suppliers, and other stakeholders involved in the procurement of goods and services. Compliance is enforced through adherence to the Business Partner Guidelines, which outline corrective measures for non-compliance, including the potential termination of contracts for serious breaches.

### The Ship Recycling Policy

The Ship Recycling Policy mandates full compliance with international conventions, including the Hong Kong Convention and the EU Ship Recycling Regulation for environmentally sound vessel dismantling. Through responsible recycling practices that promote the recovery and reuse of materials like steel, the policy addresses the impact of high-intensity raw material consumption by decreasing reliance on virgin resources and thereby lowering the burden of resource extraction.

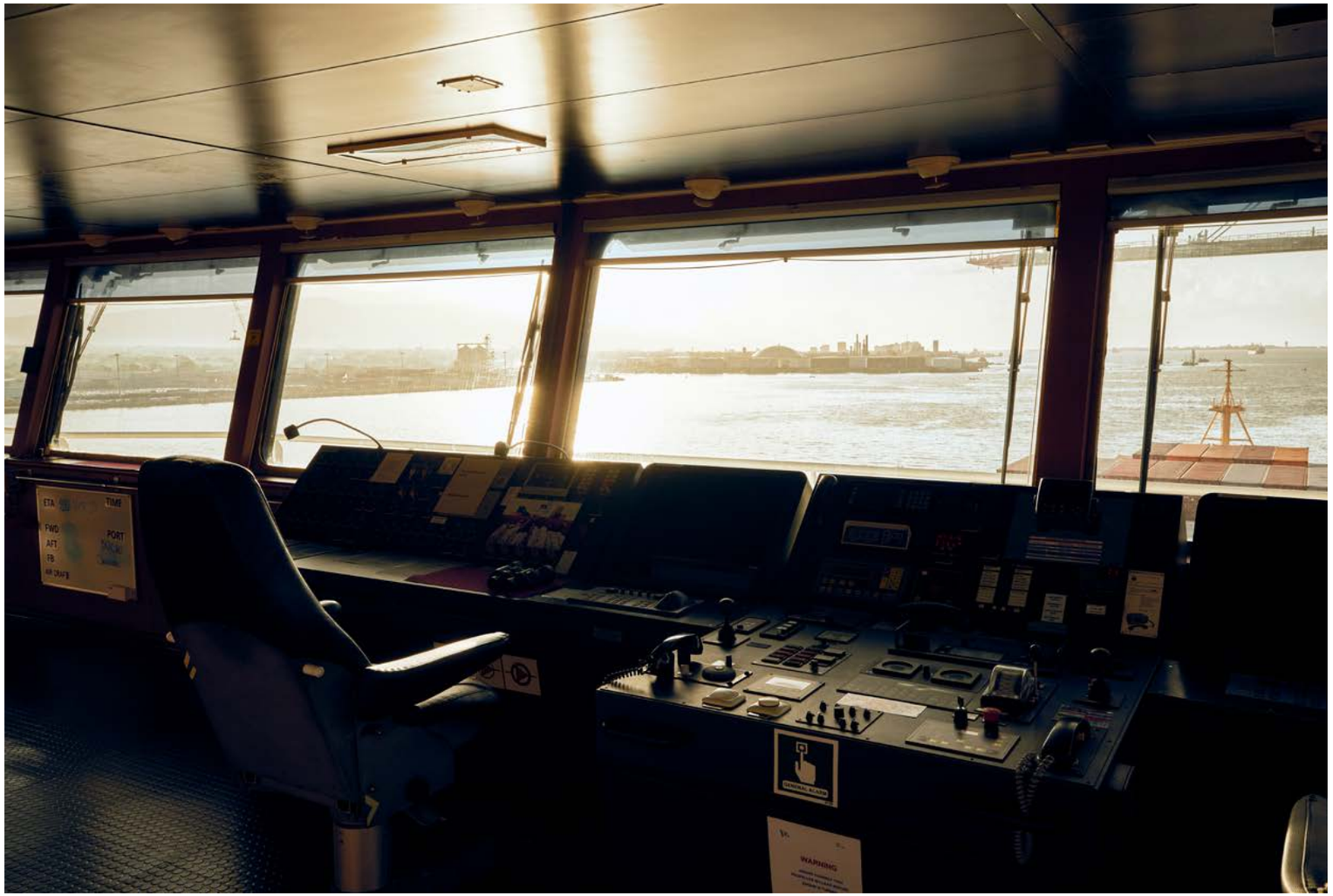
The policy applies to all MPCC employees, subsidiaries, contractors, temporary personnel, and ship managers engaged in recycling activities. Compliance is upheld through buyer and third-party commitments.

## E5-2 Actions related to resource use and circular economy

MPCC has not adopted a formal action plan specifically addressing resource use and circular economy. However, the management of its resource use – including fuel, steel, spare parts, paints and coatings – is embedded into MPCC's broader sustainability framework, guided by the policies described above.

Several actions have been implemented to strengthen the management of resource inflows. These include retrofitting vessels to improve resource efficiency, promoting responsible sourcing practices through the Business Partner Guideline, and encouraging suppliers to adopt environmentally friendly practices.

Waste management forms an integral part of MPCC's resource efficiency approach. Waste disposal and recycling processes are governed by the MARPOL convention, with strict record-keeping in the Garbage Record Book. Monitoring these waste streams provides insights into consumption patterns and opportunities to minimize excess material use.



# Metrics and Targets

## E5-3 Targets related to resource use and circular economy

In addition to adherence to the above policies, MPCC has not established a formal target connected to resource use and circular economy. However, commitments to sustainable resource management, circularity and waste generation are integrated into the Company's broader sustainability framework. As part of its forward-looking strategy, MPCC aims to define formal targets under its transition plan to address all areas of material importance.

MPCC is actively working to better understand and quantify the material impacts of resource inflows and waste generation. As data collection and impact assessments improve, MPCC will move towards setting formalized targets related to resource efficiency, sustainable procurement, and waste reduction.

MPCC tracks the effectiveness of its policies and actions via monitoring practices. Through adherence to the EU Monitoring, Reporting and Verification (EU-MRV) and IMO Data Collection System (DCS) framework, MPCC maintains precise oversight of fuel and energy consumption across its fleet. Waste management is handled through mandatory record-keeping in the garbage record book, as required by the MARPOL convention.

## E5-4 Resource inflows

MPCC's material inflows include marine fuel oil, steel, and protective coatings that are essential to its fleet. Marine fuel oil, including low-sulfur variants, is the primary energy source required for propulsion and operational efficiency. Freshwater is used onboard for domestic purposes, either sourced from shore or produced through desalination. Chemicals, such as lubricants and cleaning agents, support maintenance activities and operational processes. Additionally, steel remains a vital resource for the construction, repair, and retrofitting of vessels.

Based on data collected through the IMO Data Collection System (DCS), the total mass of fuel oil consumption for 2024 accounted for 456,157.08 tons. This includes various fuel types such as High Sulphur Heavy Fuel Oil, Low Sulphur Heavy Fuel Oil, Marine Diesel Oil (MDO) / Marine Gas Oil (MGO), and Ultra Low Sulphur Fuel Oil.

These fuels are entirely derived from non-biological sources. No biological materials or secondary materials, including reused, recycled, or intermediary components, are present in the Company's fuel inflows.

Table I provides a breakdown of fuel oil categories and their respective weights:

| FUEL TYPE | MASS (TONS) | MATERIAL TYPE |
|---|---|---|
| High Sulphur Heavy Fuel Oil | 96,570.38 | Technical (non-biological) |
| Low Sulphur Heavy Fuel Oil | 276,228.52 | Technical (non-biological) |
| Marine Diesel Oil / Marine Gas Oil (MDO/MGO) | 37,892.28 | Technical (non-biological) |
| Ultra Low Sulphur Fuel Oil | 45,465.89 | Technical (non-biological) |
| **Total** | **456,157.08** | Technical (non-biological) |

See the E5 accounting principles for a description of the methodologies and key assumptions used to calculate the E1-5 disclosure.

# E5 Accounting principles

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| All | | | All metrics cover the reporting period 1. January 2024–31. December 2024. |
| E5-4 | 32 | Resource inflows – measurement methodology and assumptions | Fuel consumption is measured according to international regulations under the IMO Data Collection System (DCS). Data is collected from onboard fuel monitoring systems, such as flow meters on fuel lines, or through manual or automated tank soundings and verified bunker delivery notes (BDNs). Consumption is recorded for each voyage, including navigation, port stays, and cargo operations.<br><br>Different fuel types—Very Low Sulphur Fuel Oil (VLSFO), Marine Gas Oil (MGO), and Ultra Low Sulphur Fuel Oil (ULSFO)—are tracked separately. Annual fuel reports are compiled and independently verified by accredited organizations before submission to the IMO through the vessel's flag state.<br><br>The key assumptions include the use of consistent calorific values and the assumption that minor deviations in measurement devices (e.g., flow meters and tank soundings) remain within acceptable tolerances. These verified data points provide a reliable basis for reporting fuel inflows. The data on resource inflows is validated by an external body. |

# SOCIAL INFORMATION

# S1 OWN WORKFORCE

MPCC recognizes its workforce's well-being, retention, and engagement as essential to maintaining efficient and sustainable operations. The Company has identified two material impacts, and one risk related to high stress levels, long working hours and employee retention within its own workforce. Addressing these challenges is a priority to ensure workforce resilience and long-term sustainability.

Through its Human Capital, Health & Safety, and Human Rights Policies, MPCC fosters a supportive work environment, promotes fair working conditions, and upholds high safety standards. The Company implements regular employee feedback surveys, engagement initiatives, flexible working arrangements, and professional development opportunities to mitigate workforce-related risks and enhance job satisfaction.

These commitments reflect MPCC's broader social sustainability objectives, ensuring its employees have a safe, secure and inclusive.

## KPIs

+ Maintain an annual onshore employee retention rate above 90%. We achieved 89.4%

## Relevant Policies

+ Human Rights Policy
+ Human Capital Policy
+ Health and Safety Policy
+ Sustainability Policy

## Reporting Standards Used

+ ESRS 2, ESRS S1

## Relevant SDGs

# Material Impacts, Risks and Opportunities

## ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Potential case of high levels of stress and long working hours for own employees | Potential negative impact | Own operations | Medium-term |
| Potential challenges with employee retention and turnover | Potential negative impact | Own operations | Short-term |
| Risk of employee stress and burnout | Risk | Own operations | Medium-term |

### Material impacts, risks and opportunities within MPCC's business model and strategy

MPCC integrates workforce well-being and employee retention into its business strategy, continuously assessing how its activities and workforce dynamics contribute to stress and burnout. It refines its approach to better support employees while ensuring operational efficiency and long-term sustainability.

The Company has identified key challenges such as high stress levels, long working hours, and workforce turnover, which impact employee well-being and contribute to absenteeism and operational inefficiencies, particularly among its onshore workforce.

To address these risks, MPCC has implemented measures to improve work-life balance, reduce excessive workloads, and enhance job stability, fostering a healthier, lower-stress work environment. Given the short- to medium-term nature of these challenges, the Company remains committed to monitoring and improving workforce policies to build a resilient and sustainable work culture.

The DMA identified the following material impacts and risks related to MPCC's own workforce:

### Material Impacts

#### Potential case of high levels of stress and long working hours for employees

High stress levels and long working hours among its employees pose potential negative impacts across the Company's onshore operations. Employees with demanding roles and responsibilities may face additional challenges such as reduced sleep, deteriorated well-being, long-term health issues, and, in severe cases, burnout, potentially impacting the employee's mental and physical health.

#### Potential challenges with employee retention and turnover

Employee retention and turnover present a potential short-term challenge for all onshore workers. High turnover rates negatively affect operational efficiency in securing workforce stability and career advancement opportunities, reducing stress and upholding employee morale.

As such, the Company focuses on initiatives to improve career development routes, increase employee engagement, and strengthen workplace stability. Its strategy considers diverse workforce segments that may be more vulnerable to turnover-related stress, ensuring that interventions target those most affected. Additionally, MPCC assesses how certain roles or working conditions may elevate the risk of employee departure, helping to refine retention strategies.

### Material Risks

**Potential case of high levels of stress and long working hours for employees**

MPCC recognizes employee stress and burnout as challenges within its operations. High workloads and extended working hours can negatively impact mental and physical well-being, resulting in financial risks such as operational inefficiencies, elevated turnover rates, increased recruitment expenses, productivity losses, and rising insurance premiums. Proactively addressing these risks mitigates financial implications and prevents operational disruptions.

Acknowledging the strategic importance of its onshore workforce, MPCC prioritizes mitigating stress-related risks to ensure organizational stability and sustained performance. Furthermore, the company assesses how specific workforce segments may be more susceptible to stress and burnout, informing the development of targeted interventions to minimize associated financial and operational risks.

# Impact, Risk and Opportunities Management

### S1-1 Policies related to own workforce

MPCC's social policies establish key principles for managing material topics related to working conditions and work-related rights across its operations. These policies integrate stakeholder interests, including employee representatives, to prioritize critical social issues within the business, which is key to MPCC's broader workforce strategy. They also address concerns identified through the DMA process, ensuring alignment with its stakeholder's expectations and a sustainable business model. MPCC ensures policy transparency, making these policies accessible to all relevant stakeholders, particularly its onshore employees.

Each policy applies to onshore workers and has been approved by the Compliance Officer, who is responsible for implementation, integration into corporate governance and decision-making, and conducting an annual review to drive continuous improvement.

#### Human Rights Policy

MPCC is committed to upholding human rights across its operations, ensuring fair working conditions, ethical labor practices, and respect for individual dignity. The Human Rights Policy aligns with international labor standards, reinforcing compliance with recognized frameworks and ethical guidelines. It sets clear expectations for responsible labor practices for its onshore workers. The policy helps mitigate workforce-related impacts by outlining key principles such as workplace fairness, non-discrimination, and the right to safe and decent working conditions.

#### Human Capital Policy

The Human Capital Policy focuses on creating a supportive work environment that promotes employee engagement, development, and retention for onshore employees. Through regular assessments, training programs, and feedback mechanisms, MPCC identifies and mitigates issues specific to its material impacts, such as workforce stress and burnout, ensuring long-term employee well-being and job satisfaction.

As part of its commitment to being an employer of choice, MPCC invests in its workforce by fostering an inclusive workplace, ensuring equal pay for equal work, and providing equal access to career development opportunities. The policy aligns with international labor standards and ethical principles, reinforcing MPCC's dedication to fair employment practices.

#### Health and Safety Policy

MPCC's Health & Safety Policy ensures that operations are conducted with a strong focus on employee well-being and in full compliance with relevant health and safety regulations. The Company is committed to fostering a safe workplace and implementing strict safety protocols, promoting adequate rest

periods for stress reduction, periodic risk assessments, and training to safeguard employee safety.

MPCC also ensures that safety principles are effectively communicated across the organization, with management leading by example to uphold high standards to facilitate a business culture that values employee's health.

### Sustainability Policy

MPCC's Sustainability Policy integrates social sustainability principles and initiatives, ensuring its approach to onshore worker's well-being is embedded within business strategy and long-term value creation for the workforce.

## Actions

MPCC recognizes that proactive measures are essential for maintaining a resilient and engaged workforce while mitigating material impacts such as stress, employee retention, and workplace well-being. Through targeted initiatives—including flexible work arrangements, professional development, diversity and inclusion efforts, and human rights training—the Company aim to prevent, monitor, and reduce workforce-related risks, supporting its social sustainability strategy.

The Company's approach prioritizes all employees, particularly the onshore workforce, ensuring inclusivity and effectiveness in addressing workforce challenges. Each initiative is an ongoing effort requiring continuous implementation to enhance employee satisfaction, retention, and operational stability while mitigating financial risks related to absenteeism and turnover in the demanding maritime sector.

These actions are integrated into MPCC's operational budget without requiring external funding, sustainable finance instruments, or significant capital expenditures. Future allocations will remain proportionate to ongoing engagement efforts, ensuring social sustainability without substantial financial impact.

### Employee feedback survey and engagement initiatives to address workplace stress

MPCC proactively addresses workplace stress, recognizing its impact on employee well-being amid demanding BAU operations. The Company conducts regular employee feedback surveys and engagement initiatives, such as off-site events, town halls, and internal gatherings, to foster informal exchanges across all levels. These efforts help us understand and mitigate workplace stressors, particularly for its onshore workforce, and address work-related impacts identified in the materiality assessment. This ongoing commitment will continue in 2025, reinforcing its dedication to a supportive work environment.

### Inclusive and diverse workplace

Diversity and inclusion are part of its efforts to build a positive and cohesive work culture. To achieve this, MPCC have implemented focused policies and workplace culture that promote equal opportunities, diversity, and inclusive hiring practices, ensuring that all employees benefit from a fair and supportive work environment. These principles are designed to strengthen employee engagement, improve collaboration, and contribute to long-term workforce stability.

### Flexible working arrangements and professional growth opportunities

Flexible working arrangements and professional individual growth opportunities are essential to supporting long-term employee engagement and reducing workplace stress for its onshore employees. Initiatives such as career development programs and training opportunities are key to enhancing employee skills and career progression. These efforts are designed to improve job satisfaction, reduce burnout, and strengthen workforce retention.

### Execution of e-learning courses on human rights

MPCC is committed to enhancing awareness and understanding of human rights among its employees through the execution of e-learning courses on human rights. These courses are designed to educate employees on the material impacts linked to key human rights principles, ethical labor practices, and workplace rights, ensuring alignment with international human rights and MPCC's Human Rights, Human Capital and Sustainability policies.

## S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Annual Onshore Employee Retention Rate Above 90%

MPCC has set a target to maintain an annual onshore employee retention rate above 90% within its own operations. This target aligns with the Human Capital Policy, which commits to implementing a professional development program to secure employee retention.

The Company aims to sustain a retention rate above 90%, measured as a percentage of employees retained annually. In 2024, the Company achieved a retention rate of 88,8%, indicating that we are close to our target. The Company has been tracking the progress of this action to date, and it will continue to be monitored annually through 2025. To support this goal, MPCC has implemented key initiatives such as performance reviews, enhanced employee engagement strategies, employer branding and flexible working arrangements.

This target is based on internal workforce data, employee feedback, and industry standards, ensuring a data-driven approach to measuring and improving retention. To track progress, MPCC utilizes employee surveys and retention tracking, allowing for further assessments and refinement of workforce strategies.

## Metrics

### Characteristics of MPCC's employees

#### EMPLOYEE HEADCOUNT BY GENDER AT THE END OF 2024

| GENDER | NUMBER OF EMPLOYEES (ANNUAL AVERAGE) |
|---|---|
| Male | 27 |
| Female | 11 |
| Other | - |
| Not reported | - |
| **Total Employees** | **38** |

#### EMPLOYEE HEADCOUNT BY LOCATION

| COUNTRY | NUMBER OF EMPLOYEES (HEAD COUNT) |
|---|---|
| Norway | 6 |
| Germany | 29 |
| Netherlands | 3 |
| **Total** | **38** |

#### EMPLOYEE TURNOVER

| EMPLOYEE TURNOVER | |
|---|---|
| Employee turnover rate (%) | 11.16 |
| Employees who left the company during the reporting period | 5 |

# S1 Accounting principles

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| MDR-M | 77, 77a | Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity, Disclosure of methodologies and significant assumptions behind metric | The annual employee retention rate is calculated by dividing the number of employees who leave during a specific period by the average number of employees in the Company during that same time and multiplying by 100, ensuring retention is expressed as a percentage. |
| S1-6 | AR 59 | For the own employee turnover calculation, the undertaking shall calculate the aggregate of the number of employees who leave voluntarily or due to dismissal, retirement, or death in service. The undertaking shall use this number for the numerator of the employee turnover rate and may determine the denominator used to calculate this rate and describe its methodology. | The employee turnover rate is calculated by comparing the number of employees on the reporting date (December 31) with the number at the start of the 2024 reporting period. The turnover rate is determined by dividing the number of employees who left during the year (5) by the total employees at the beginning of the period. |

# S2 WORKERS IN THE VALUE CHAIN

MPCC recognizes the importance of safeguarding workers' well-being, safety, and rights across its value chain, including seafarers, ship recycling workers, and other supply chain workers. While seafarers fall into its value chain, they are a distinct group central to MPCC's operations, crucial in ensuring business continuity and operational success. The Company has identified thirteen material impacts, two risks, and one opportunity, reinforcing its commitment to addressing critical challenges such as health and safety risks, working conditions, and human rights protections.

Through its Human Rights, Health & Safety, Sustainability, and Human Capital Policies, MPCC promotes fair labor practices, safe working environments, and ethical supply chain management. Key initiatives include training programs for seafarers, enhanced ship recycling standards, human rights education for stakeholders, and workplace well-being initiatives. These efforts align with international labor laws and industry best practices to mitigate risks and ensure compliance.

The Company continuously monitors safety performance, conducts audits, and implements proactive measures to uphold standards and drive positive change within its value chain.

### KPIs

+ Lost Time Injury Rate (LTIR)
+ Zero Serious Injuries

### Relevant Policies

+ Human Rights Policy
+ Health and Safety Policy
+ Sustainability Policy
+ Human Capital Policy
+ Business Partner Guidance
+ Ship Recycling Policy

### Reporting Standards Used

+ ESRS 2, ESRS S2

### Relevant SDGs

# Material Impacts, Risks And Opportunities

## ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| **Working conditions** | | | |
| Decreased lifespan of ship recycling workers | Actual negative impact | Downstream | Recurring |
| Accidents and fatalities in ship recycling yards | Potential negative impact | Downstream | Short term |
| Fatalities of workers in the value chain | Potential negative impact | Upstream | Short term |
| Suboptimal working conditions for supply chain workers | Potential negative impact | Upstream | Medium-term |
| Stress in the workforce (Seafarers) | Potential negative impact | Downstream | Short term |
| High retention of staff contracts of crew on board the vessels | Actual positive impact | Downstream | Recurring |
| Overtime seafarers | Actual negative impact | Downstream | Recurring |
| Major health and safety issues (Seafarers) | Potential negative impact | Downstream | Short term |
| Non-compliance with Hong Kong convention on working conditions of workers in ship recycling | Risk | Downstream | Short term |
| Societal development leads to people losing interest in jobs with hard working conditions | Risk | Downstream | Medium-term |
| Recording of LTIF and "Lessons Learned" | Opportunity | Downstream | Short term |
| **Other work-related rights** | | | |
| Human rights abuses of smaller suppliers down the value chain | Potential negative impact | Upstream | Medium-term |
| Limited freedom of ship recycling yard workers | Potential negative impact | Downstream | Short term |
| Minors working in ship recycling yards | Potential negative impact | Downstream | Short term |
| Single rooms onboard of vessels (Seafarers) | Actual positive impact | Downstream | Recurring |
| Availability of internet connection (Seafarers) | Actual positive impact | Downstream | Recurring |

### Material impacts, risks and opportunities within MPCC's business model and strategy

MPCC integrates workforce well-being, safety, and human rights into its business model and strategy, ensuring that material impacts, risks, and opportunities across its upstream and downstream value chain are assessed and addressed in alignment with the Company's policies. This approach establishes a business framework that prioritizes social sustainability in the supply chain. While MPCC's workforce includes ship recycling workers and other value chain employees who face various transnational impacts its crew members hold a distinct position within the value chain. As a central part of MPCC's operations, crew members are essential to ensuring business continuity and the successful execution of maritime activities, making their safety and well-being a core focus of the Company's commitment to responsible labor practices.

The maritime industry presents inherent risks that can impact workers across MPCC's value chain. These include potential exposure to hazardous substances and workplace accidents, which may result in physical injuries, psychological distress, or, in severe cases, fatalities. MPCC remains committed to mitigating these risks and prioritizing worker safety and well-being throughout its operations and partnerships.

Building on this commitment, MPCC recognizes the material significance of these impacts, risks and opportunities, MPCC evaluates how its business relationships, operational structures,

and contractual agreements may contribute to or mitigate these challenges. This includes monitoring supplier compliance, implementing safety measures, and improving working conditions for both offshore and supply chain workers. Given the short- to medium-term nature of many of these risks, MPCC remains committed to proactively addressing these issues through continuous engagement, responsible business practices, and alignment with evolving industry standards.

The DMA identified the following impacts, risks and opportunities relating to workers in MPCC's value chain to be material.

### Material impacts – Working Conditions

#### Major health and safety issues (Seafarers)

Health and safety incidents offshore have long been a critical focus in the maritime industry, given their potential for severe and lasting consequences. For MPCC, such incidents can have negative impacts on its downstream value chain, particularly in distribution for crew members onboard MPCC's vessels. While fatalities at sea are rare, they carry profound and irreversible consequences—resulting in loss of life, emotional distress, and financial instability for affected families. Recognizing the historical significance of offshore safety risks, MPCC remains committed to protecting its workforce and upholding the highest safety standards across its operations.

#### Decreased lifespan of ship recycling workers

The decreased lifespan of ship recycling workers is a recurring, actual negative impact within MPCC's downstream value chain, affecting those exposed to harsh working conditions and toxic substances in end-of-life operations. These workers face severe health risks, including long-term illnesses that reduce life expectancy. Understanding workers' risks in fleet operations is essential to addressing harmful industry practices and advocating for higher safety standards.

#### Accidents and fatalities in ship recycling yards

Accidents and fatalities in ship recycling yards represent a short-term potential negative impact within MPCC's downstream value chain, posing risks to workers at the end-of-life stage, including physical injuries and loss of life. These incidents create an unsafe and unstable work environment, affecting workers' physical and mental well-being, highlighting the need for ongoing risk evaluation and management oversight.

#### Fatalities of workers in the value chain

The shipbuilding and ship-repair sector faces significant risks related to worker fatalities, making it a major concern in the global industry. As MPCC's operations include ship newbuilding and ship-repair in its upstream and downstream value chain, there is an inherent risk of such incidents affecting workers. Fatalities due to unsafe working environments are the primary concern, posing a serious threat to worker safety. Furthermore, unsafe working conditions in shipyards contribute to additional insecurities among workers, potentially leading to higher turnover rates.

Recognizing the high-risk nature of shipbuilding, MPCC is committed to identifying and assessing workplace hazards, addressing unsafe practices, and ensuring worker protection. The company prioritizes providing all materially impacted workers with a safe and secure working environment.

#### Suboptimal working conditions for supply chain workers

MPCC recognizes suboptimal working conditions as a medium-term potential negative impact affecting all workers across both the upstream and downstream value chain including ship repair and ship recycling which occur at both stages of the supply chain. Some workers in MPCC's supply chain, operating in high-risk jurisdictions, face inconsistent compliance with labor standards, wage disparities, and unequal access to social protections and health and safety measures. Given the complexity of the global supply chain, MPCC acknowledges the vulnerability of supply chain workers.

These challenges stem from varying local regulations, limited traceability, and visibility into supplier practices, making it difficult to enforce consistent labor and safety standards across diverse regions. As a result, workers may face heightened risks to their health, safety, and job security.

#### Stress and overtime for Seafarers

Stress and overtime are common challenges for seafarers within distribution, representing a negative impact in MPCC's downstream value chain. Overtime is a recurring actual impact, while workforce stress is a short-term potential impact.

The demanding nature of offshore work for crew members and extended working hours contribute to mental health challenges, reduced productivity, and increased absenteeism, while excessive overtime leads to fatigue and burnout. MPCC ensures compliance with international regulations related to working hours and manages stress and overtime risks through the technical managers system, which monitors employee working hours. Additionally, the Company

is committed to reducing these risks by strategically improving stress-related impacts due to overtime.

At the same time, variations in crew size and commercial terms may result in instances of overtime, particularly in offshore operations where extended work periods are common. Given the long-term effects of excessive working hours, MPCC continues to evaluate working conditions and implement measures to mitigate stress-related risks, ensuring that its seafarers are protected from prolonged working hours.

### High retention of staff contracts of crew on board the vessels

High retention of crew members and recurring contracts with already familiarized crew on board the vessels have a positive impact on the workforce's financial and professional stability. While MPCC is not the direct employer of offshore workforce and crews, its collaboration with crewing agencies highlights the happiness with MPCC as a contractor. This is supported by efforts to provide favorable contractual terms and ongoing skills development, ultimately benefiting both the workforce and operational performance.

## Material impacts – Other work-related rights

### Human rights abuses of smaller suppliers down the value chain

Human rights abuses by smaller suppliers present a short-term potential negative impact on MPCC's upstream and downstream value chain. These abuses may include forced labor, wage exploitation, and inadequate working conditions. This issue is prevalent across the maritime and shipbuilding industries due to the complexity of global supply chains, the lack of unified labor standards, and historical cases of unethical labor practices. MPCC recognizes the challenge of ensuring ethical labor practices across all supplier tiers and is committed to strengthening oversight mechanisms to prevent such violations, aligning with best practices to promote fair and responsible sourcing.

### Limited freedom of ship recycling yard workers

Limited freedom of ship recycling yard workers represents a recurring potential negative impact on MPCC's downstream value chain. In some regions, workers may face restricted movement, lack of collective bargaining rights, and inadequate representation in workplace decisions. MPCC acknowledges these risks and evaluates ways to enhance worker protection within the ship recycling industry.

### Minors working in ship recycling yards

The presence of minors in ship recycling yards is a short-term potential negative impact on MPCC's downstream value chain. Child labor remains a concern in certain shipbreaking regions, where economic pressures force underage workers into hazardous environments. MPCC strictly prohibits child labor within its value chain and works to ensure that all contracted recycling facilities comply with International Labor standards.

### Single rooms onboard vessels

Providing single rooms onboard vessels presents a recurring actual positive impact in MPCC's downstream value chain for distribution workers. Access to private accommodation improves crew well-being, offering personal space for rest and recovery during long voyages. This contributes to better mental health, higher job satisfaction, and improved working conditions for seafarers.

### Availability of internet connection

The availability of internet connection onboard vessels is a recurring actual positive impact in MPCC's downstream value chain. Reliable internet access allows seafarers to stay connected with family and access digital entertainment, reducing feelings of isolation and improving overall mental well-being. MPCC has rolled out Starlink connectivity across its fleet, ensuring that crew members benefit from enhanced communication and access to online resources.

## Material risks and opportunities

### Non-compliance with the Hong Kong Convention on working conditions in ship recycling

MPCC recognizes non-compliance with the Hong Kong Convention on ship recycling in its downstream operations as a short-term material risk. The convention sets international standards for safe and environmentally sound ship recycling, ensuring the health, safety, and welfare of vulnerable workers in recycling yards. Failure to comply with these standards, particularly regarding labor rights and workplace safety, may lead to legal liabilities, financial penalties, reputational damage, and restricted access to capital due to increased financing requirements from banks.

### Societal development leading to Declining Interest in physically demanding jobs

The declining interest in physically demanding jobs presents a medium-term material risk within MPCC's downstream value chain in distribution. A growing trend in Western and industrialized nations

shows a reduced willingness to perform physically intensive labor, leading to a shrinking talent pool for seafarers. This shift presents recruitment challenges, increased competition for talent, and rising labor costs.

### Recording of Lost Time Injury Frequency (LTIF) and "lessons learned"

MPCC identified the recording of LTIF and "Lessons Learned" as a short-term financial opportunity within its downstream value chain. Through the technical managers monitoring, all accidents and near misses are documented and analyzed to develop preventive safety measures. This proactive approach enhances workforce safety, operational efficiency, and risk mitigation. Fewer accidents result in fewer disruptions, minimizing the need for crew replacements and unplanned downtime, positively impacting financial performance and workforce stability.

# Impact, Risk and Opportunities Management

## S2-1 Policies related to value chain workers

MPCC's policies are fundamental to how the Company governs identified material topics. Each policy applies to all upstream and downstream value chain workers, including ship recycling and distribution workers, as well as suppliers, who are required to adhere to these principles to safeguard workforce rights. For more information on how MPCC considers stakeholders and manages these policies, please refer to S1 Policies.

### Human rights Policy

MPCC's Human Rights Policy reinforces its commitment to respecting human rights and addressing salient labor issues. The policy aligns with international frameworks, including the International Bill of Rights, ILO Fundamental Conventions on Labor Standards, the UN Guiding Principles on Business and Human Rights, and all applicable national laws. It establishes principles to prevent human rights abuses across the value chain, focusing on crew working conditions, ship recycling risks, non-discrimination, forced labor, child labor, human trafficking and ethical supply chain management.

### Health and safety Policy

MPCC's Health & Safety Policy ensures a safe working environment for offshore workers across the upstream and downstream value chain. It outlines key principles related to safe working conditions, including protection against hazardous substances, safety training, and the provision of protective equipment in the marine environment. It also mandates that offshore management comply with relevant national and international laws and industry standards to uphold workplace safety.

### Sustainability Policy

MPCC's Sustainability Policy focuses on the integration of social sustainability throughout its operations and value chain. The policy aligns with key international frameworks such as the Sustainable Development Goals and the Hong Kong Convention. It seeks to minimize sustainability impacts related to upstream workers, ship recycling, and distribution workers in downstream operations.

### Human Capital Policy

MPCC's Human Capital Policy outlines key workplace practices that prioritize the well-being of value chain workers. This includes measures to alleviate stress and enhance retention through professional development. These principles align with MPCC's commitment to safeguarding the rights of value chain employees while ensuring compliance with international and national labor regulations.

### Business Partner Guidance

The Business Partner Guideline sets out MPCC's expectations for suppliers and business partners, emphasizing compliance with International Labor laws, human rights standards, and

ethical practices. The policy addresses material impacts, risks, and opportunities, including child rights, health and safety, and injury prevention. It mandates transparency, regular monitoring, and collaboration to ensure fair working conditions and prevent exploitation, particularly in ship recycling yards and among smaller suppliers down the value chain.

### Ship Recycling Policy

MPCC's Ship Recycling Policy outlines the Company's commitment to responsible and sustainable ship recycling, ensuring the protection of human rights and worker welfare for value chain workers throughout the process. The policy aligns with the Hong Kong Convention, the Basel Convention, and the EU Ship Recycling Regulation, ensuring that all recycling activities uphold safety and environmental standards. It also defines specific requirements for MPCC-owned vessels and expectations for third-party buyers when vessels are sold for potential recycling.

## S2-4 Taking action on material impacts on own workforce, and approaches to managing risks and pursuing opportunities related to value chain workers, and effectiveness of those actions

MPCC is committed to safeguarding the rights and well-being of value chain workers while mitigating risks such as hazardous working conditions, human rights violations, excessive working hours, and workforce stress. To address these challenges, the Company has implemented key initiatives, including enhanced health and safety protocols aligned with the Hong Kong Convention and EU Ship Recycling Regulation, stricter oversight of smaller suppliers' working conditions, and improvements in internet access and single-room accommodations for offshore crew members. These initiatives cover upstream suppliers (raw materials – Tier 1, 2, and 3), ship recycling at end-of-life, and offshore distribution.

To ensure accountability, MPCC provides a complaints mechanism for impacted stakeholders. For details on how MPCC facilitates remedies for stakeholders affected by adverse impacts in the value chain, refer to S1 Actions.

MPCC ensures appropriate resource allocation for effective execution. For further information on resource planning and financial allocation, see S1 Actions.

### Training and Education

Ensuring a safe and healthy work environment for seafarers in its downstream operations is a key priority in MPCC's commitment to workforce well-being and operational safety. To achieve this, MPCC has implemented focused training and education initiatives, ensuring that all offshore workers are upskilled and possess the necessary competencies to manage the specific risks and challenges of their roles in maritime environments. Through these efforts, MPCC aims to foster a safer, more resilient workplace while contributing to long-term workforce retention and stability.

### MPCC Ship Recycling Policy

Safe and ethical ship recycling practices are core to MPCC's commitment to worker well-being and environmental responsibility. To achieve this, the Company has implemented focused initiatives under the Ship Recycling Policy, which mandates strict alignment to the EU Ship Recycling Regulation and other international standards such as the Hong Kong Convention to ensure safe and responsible vessel disposal for the ship recycling workers in the end-of-life downstream operations. These measures are designed to protect ship recycling workers from hazardous conditions, prevent human rights violations, and promote fair working conditions in recycling yards. Through these efforts, the Company aims to enhance industry-wide best practices and drive long-term improvements in worker protection and broader social sustainability within the ship recycling sector.

### E-Learning on Human Rights

Ensuring awareness and adherence to human rights standards allows MPCC to align with ethical and responsible ship recycling practices. To strengthen this commitment, the Company have introduced an E-learning on Human Rights course, which provides training on globally recognized human rights principles and safety standards. Through this, workers and management can identify human rights risks at the yards, creating a culture of accountability and responsible business conduct.

### Well-being Survey

Understanding and addressing the well-being of offshore workers is important for its operations; therefore, MPCC prioritizes offshore worker well-being to manage material impacts effectively. In 2024, MPCC launched a Well-being Survey to identify key stress factors, mental health challenges, and areas for improvement in crew welfare. Insights from the survey will inform targeted initiatives to enhance mental health support, working conditions, and overall crew satisfaction at sea.

## Promoting Healthier Lifestyles

Supporting the physical and mental well-being of offshore workers is a priority in MPCC's commitment to workforce health and safety efforts. To promote healthier lifestyles, MPCC introduced an initiative that encourages balanced diets and active living on board. This program emphasizes nutritional awareness, healthier meal options, and opportunities for physical activity, enhancing both physical fitness and mental health.

## Internet Access

MPCC recognizes the challenges of isolation faced by offshore workers separated from their families. Therefore, enhancing onboard connectivity is a key priority, providing offshore workers with opportunities to stay connected with their families and access digital entertainment. To support this, MPCC have implemented a fleetwide rollout of Starlink that crew members can use to have reliable and secure internet access throughout their time at sea.

## Anti-Harassment Campaign

MPCC is committed to fostering a respectful and inclusive workplace for offshore workers. MPCC´s Anti-Harassment Campaign raises awareness about harassment prevention, respectful workplace behavior, and MPCC's zero-tolerance policy. This initiative ensures a safe, supportive environment where harassment is identified, reported, and addressed.

## Sports on Board Campaign

Ensuring offshore workers' physical well-being and stress reduction is vital for job performance and safety. MPCC's Sports on Board campaign uses competitive gamification to promote physical fitness, teamwork, and an active lifestyle among crew members. This initiative supports stress reduction, mental well-being, and overall health, helping seafarers maintain a balanced routine at sea.

# Performance, Metrics & Targets

## S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Lost Time Injury Rate (LTIR)

MPC Container Ships has set a target to maintain a Lost Time Injury Rate (LTIR) not exceeding 0.3 by 2030 for seafarers in our downstream value chain. This target aligns with the objectives outlined in MPCC's Health and Safety Policy, reinforcing the Company's commitment to ensuring a safe and secure working environment for seafarers. Tracking of this target began in 2021 starting at 1.17 and was reduced to 0.05 in 2023, providing a reference point for ongoing improvements.

MPCC actively monitors LTIR through safety performance metrics, regular safety audits, emergency drills, and structured training programs, all coordinated by technical managers within the downstream value chain. The methodology for defining this target is aligned with IMO´s International Safety Management Code (ISM Code).

To enhance safety culture and target-setting effectiveness, MPCC engages with industry stakeholders, safety organizations, and regulatory bodies that provide insights and recommendations for continuous improvement. For details on how MPCC aim to address changes to all targets please refer to S1 Targets.

### Zero Serious Injuries

MPCC has set a target of zero serious injuries within its fleet operations, reinforcing its commitment to the highest safety standards for seafarers. This target aligns with MPCC's Health and Safety Policy, which prioritizes the prevention of workplace accidents and the continuous improvement of safety measures. To achieve this, MPCC implements ongoing safety training to prevent serious injuries on board.

Tracking of this target began in 2021, when one serious injury was recorded. However, MPCC has successfully maintained zero serious injuries since 2022. The target applies to the entire fleet, with progress monitored continuously through 2025 and beyond to sustain a zero-injury workplace.

MPCC actively monitors safety performance through audits and drills, ensuring ongoing assessment and continuous improvement. This approach aligns with international safety standards and involves collaboration with relevant stakeholders, as outlined in MPCC's LTIR target.

### AI Safety Monitoring System

MPCC is piloting the ShipIn system, installing 20+ AI-powered cameras on five vessels to analyze video footage and provide feedback to ship command and shore-side personnel at WASM. This initiative aims to enhance safety, reduce accidents, and enforce compliance with regulations. The decision on a full-scale rollout is expected later this year, with progress being monitored as part of MPCC's sustainability targets.

## Metrics

### HEALTH AND SAFETY METRICS – WORKERS IN THE VALUE CHAIN

| METRIC | 2024 | 2023 | 2022 |
|---|---|---|---|
| Percentage of workers in headcount who are covered by the Company's health and safety management system based on legal requirements and/or recognized standards or guidelines | 100 | 100 | 100 |
| Number of fatalities as a result of work-related injuries and work-related ill health | - | - | - |
| Number of recordable work-related accidents (excluding fatalities) | 10 | 3 | 7 |
| Rate of recordable work-related accidents | 0.36 | 0.05 | 0.14 |
| Number of cases of recordable work-related ill health | 10 | n/a | n/a |
| Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health | 9 | 7 | 10 |

### HEALTH AND SAFETY METRICS – WORKERS IN THE VALUE CHAIN (VESSELS)

| INCIDENT TYPE | VALUE | UNIT |
|---|---|---|
| Total Exposure hours | 11,535,489.00 | Number |
| Total Fatalities due to injuries | - | Number |
| Average incident resulting in absence from work | 0.15 | Number |
| Average Lost Time Incident Rate | 0.36 | LTIR |
| Average Lost Time Injury Frequency Rate | 1.78 | LTIF |
| Average Lost workday cases | 0.13 | Number |
| Total Permanent partial disabilities | 1 | Number |
| Total Permanent total disabilities | 5 | Number |
| Total hours worked by employees | 10,691,569.50 | Number |

# S2 Accounting principles

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| MDR-M | 75, 77a | Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity, Disclosure of methodologies and significant assumptions behind metric | MPCC measures **Lost Time Injury Rate (LTIR)** and **Lost Time Injury Frequency Rate (LTIF)** to track work-related injuries across its fleet.<br><br>**LTIR** measures the frequency of work-related injuries resulting in lost workdays, standardized per 200,000 hours worked. MPCC targets an LTIR below 0.3 by 2030.<br><br>**LTIF** measures the frequency of lost-time injuries per 1,000,000 hours worked, serving as an additional safety performance indicator.<br><br>LTIR and LTIF are calculated per vessel first, and the final figures disclosed by MPCC represent the fleet-wide average of these individual vessel rates. The methodology for these calculations is as follows:<br><br>**LTIR** = (Number of Lost Workday Cases × 200,000) / Total Hours Worked<br><br>**LTIF** = (Number of Lost Workday Cases × 1,000,000) / Total Hours Worked<br><br>The total hours worked include offshore operations, accounting for all employee and contractor work hours.<br><br>**Serious Injury**<br>The Serious Injury Count monitors incidents that result in severe, life-threatening, or permanently disabling injuries, with an aspirational target of zero serious injuries. |

# ENTITY SPECIFIC – SEARCH AND RESCUE

MPCC recognizes its legal and humanitarian obligations in Search and Rescue (SAR) operations, ensuring compliance with the Safety of Life at Sea (SOLAS) Convention. The Company has identified three material impacts related to SAR: lives saved through sea rescue, crew safety risks during rescue operations, and the principle of non-refoulement for rescued individuals.

Its commitments are embedded in Health & Safety, Human Rights, and Human Capital Policies, ensuring alignment with international safety standards, worker protection, and ethical labor practices. MPCC implements continuous mitigation measures, including operational monitoring, safety protocol implementation, and audits, which certified technical managers manage. The Company will continue refining its SAR framework, balancing its obligations to crew workers, rescued individuals, and local communities.

**KPIs**

+ Number of SAR operations attended

**Relevant Policies**

+ MPCC is in the process of developing a policy in 2025

**Reporting Standards Used**

+ ESRS 2

**Relevant SDGs**

# Material Impacts, Risks and Opportunities

## ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Lives saved through sea rescue | Actual positive impact | Own operations | Recurring |
| Crew safety risk due to sea rescue | Potential negative impact | Own operations | Short-term |
| Not meeting the principle of non-refoulment for rescued migrants and refugees | Potential negative impact | Own operations | Short-term |

### Material impacts, risks, and opportunities within business model and strategy

A part of MPCC's business activity might be affected by Search and Rescue (SAR) operations, fulfilling its obligation under the International Convention for the Safety of Life at Sea (SOLAS) to assist individuals in distress, regardless of nationality, status, or circumstances. In international shipping, responding to distress calls is both a legal and humanitarian duty, particularly for crew members in the downstream value chain.

Given the impact of SAR operations on stakeholders, including safety and security risks, MPCC's business model requires an effective strategic approach to manage these challenges. MPCC remains committed to balancing its legal obligations, crew safety, and community obligations, continuously adapting its strategy and operational frameworks to mitigate risks while maintaining its role in protecting lives at sea.

### Material impacts

#### Lives saved through sea rescue

In the event of an SAR operations MPCC's efforts and support have a recurring positive impact by saving lives at sea, reinforcing the Company's commitment to humanitarian responsibilities in the downstream value chain. Many migrants and refugees risk their lives in distress at sea, relying on merchant vessels such as MPCC's for rescue. The Company has already conducted search and rescue operations, demonstrating a direct, life-saving impact.

These efforts underscore the vital role of crew members in SAR missions, emphasizing the importance of seafarers in responding to distress situations. The Company recognizes that certain crew members working in maritime areas with high SAR probability may be more directly impacted, necessitating adequate training and support to ensure their safety and well-being.

The positive impact of SAR operations is expected to remain a long-term and recurring aspect of MPCC's business, as maritime migration continues to pose risks for vulnerable individuals at sea. The Company remains committed to ensuring safe, effective rescue operations while safeguarding the welfare of its crew.

#### Crew safety risk due to sea rescue

Search and rescue operations have potential short-term safety impacts for crew members in the Company´s downstream value chain. When responding to distress calls, vessels may take on 50–60 individuals in highly stressful conditions, where fear and

misunderstandings can escalate into conflict, leading to potential physical and psychological harm.

These risks primarily impact seafarers directly involved in rescue efforts, requiring specialized de-escalation training and crisis management skills to handle high-pressure situations safely and effectively.

### Not meeting the principle of non-refoulement for rescued migrants and refugees

MPCC recognizes that search and rescue (SAR) operations can have a potential negative impact if the principle of non-refoulement is not upheld. Under the International Convention for the Safety of Life at Sea (SOLAS), shipmasters ought to assist individuals in distress at sea. However, this obligation extends beyond rescue, requiring vessels to transport rescued individuals to a place of safety where their lives and freedoms are not at risk. These risks occur particularly in likely SAR zones maritime zones where migration routes intersect with commercial shipping lanes.

Failure to uphold non-refoulement could result in rescued migrants and refugees being returned to high-risk regions, where they may potentially face persecution. This humanitarian challenge may have a negative effect on stakeholders.

# Impact, Risk and Opportunities Management

## Policies

MPCC is committed to assisting individuals in distress at sea, recognizing the humanitarian and legal responsibilities of search and rescue (SAR) operations. While there is currently no standalone SAR policy, our commitments to safety, human rights, and worker protections are embedded in existing policies, including the Health & Safety Policy, Human Capital Policy, and Human Rights Policy with management approval. These policies address crew welfare, and guide SAR-related decision-making. For more information, please refer to the Policies section under S2.

SAR-related responsibilities continue to be overseen by technical managers, ensuring regulatory alignment and the safety of both crew and rescued individuals. MPCC's policies align with global frameworks such as IMO and MARPOL standards, ensuring ethical governance, compliance, and transparency.

## Actions

MPCC complies with the Safety of Life at Sea (SOLAS) Convention, which mandates assisting persons in distress at sea. The Company recognizes its human rights and safety responsibilities in Search and Rescue (SAR) operations and is committed to developing a formal SAR action plan, focusing on operational readiness, legal compliance, and enhanced safety protocols.

Mitigation measures are overseen by technical managers certified under quality and environmental management systems. They monitor operations, implement safety protocols, and conduct regular audits to ensure compliance with international regulations. MPCC also remains committed to providing appropriate remediation for individuals affected during SAR operations, ensuring rescued persons receive safe passage and necessary assistance.

As part of the broader safety and human rights commitments, MPCC continues refining its SAR approach, balancing its obligations to offshore workers, rescued individuals, and local communities.

## Targets

MPCC has not previously set a formal target for Search and Rescue (SAR) operations, as these activities are governed by binding legal requirements, particularly under the Safety of Life at Sea (SOLAS) Convention.

Since no previous targets have been set, there are no milestones or prior performance metrics to report. The development of SAR commitments will be rooted in international legal requirements, ensuring full alignment with SOLAS and core regulatory frameworks. For details on target-setting processes and methodology updates, please refer to S1 Targets.

## Metrics

### ENTITY SPECIFIC – SAR OPERATIONS

| | |
|---|---|
| Number of people in distress supported by MPCC | 52 |

# GOVERNANCE INFORMATION

# G1 BUSINESS CONDUCT

Working on business conduct entails continually improving how MPCC shape its corporate culture, including key aspects such as whistleblowing, political engagement, supplier relationships, and the prevention of corruption and bribery.

MPCC upholds these principles by operating with integrity and adhering to all applicable laws in the countries where it does business. MPCC is dedicated to fostering a strong culture of integrity, striving for full compliance with the Corporate Governance Policy and Company Code of Conduct, with zero tolerance for corruption.

On the topic of business conduct MPCC has therefore identified five material impacts, risks and opportunities across the themes of corporate culture, payment practices and corruption & Bribery. This reflects a broader company focus on ethical business practices, financial responsibility in supplier relationships, and strong governance frameworks to help mitigate any corruption and compliance risks.

## KPIs

+ ESG policies updated and made available on website
+ Develop and implement ESG digital course for internal and external stakeholders
+ Annual high quality ESG disclosures based on ESRS
+ Identify, assess, integrate and monitor anti-corruption risks
+ Implement annual testing and training of MPCC whistleblower system

## Relevant Policies

+ Code of Conduct
+ Corporate governance policy
+ Anti-corruption policy
+ Sanctions Policy

## Reporting Standards Used

+ ESRS G1

## Relevant SDGs

# Material Impacts, Risks and Opportunities

## ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

| IMPACT | IRO TYPE | LOCATION IN VALUE CHAIN | TIME HORIZON |
|---|---|---|---|
| Corporate culture – Openness and values of trust and collaboration | Positive actual impact | Own operations | Short-term |
| Payment practices – Payment of suppliers on time | Positive actual impact | Upstream | Short-term |
| Management of relationships with suppliers – Engagement with ship recycling yards | Positive potential impact | Downstream | Short-term |
| Payment practices – Technical manager needs to stop management of an MPCC vessel due to lack of funding | Risk | Own operations | Short-term |
| Corruption and bribery – Money laundering risk due to the nature of the business | Risk | Own operations | Short-term |

The MPCC double materiality assessment identified the following material impacts, risks and opportunities relating to business conduct.

### Material impacts

#### Corporate culture – Openness and values of trust and collaboration

Good corporate governance is essential to maintaining the integrity and efficiency of MPCC, fostering trust, and ensuring transparency for its stakeholders. MPCC has a positive actual impact on its staff by promoting openness and values of trust and collaboration.

The Company has an open and welcoming corporate culture, with a focus on integrating management as an integral part of the workforce. By fostering a collaborative and transparent environment, MPCC promotes a positive workplace where individuals feel comfortable expressing their opinions and being themselves. This, in turn, enhances employee well-being and overall job satisfaction.

#### Payment practices – Payment of suppliers on time

MPCC has an actual positive impact on direct suppliers in its upstream value chain and the technical managers in its downstream value chain, by ensuring that it pays them on time. To strengthen its positive impact on suppliers through payment practices, MPCC makes use of framework agreements that facilitate long-term payment practices. Strong supplier payment practices build trust, enhance supply chain reliability, and foster long-term partnerships, ultimately supporting business stability, sustained investment, and competitive advantage.

#### Management of relationships with suppliers – Engagement with ship recycling yards

MPCC can have a positive impact on the shipping industry as result of selecting ship recycling yards that uphold high environmental and social standards, including fair working conditions, wages, and health and safety measures. Through these audits and ongoing engagement, MPCC can contribute to improving worker conditions across the value chain, significantly enhancing their well-being.

### Material risks and opportunities:

#### Payment practices – Technical manager needs to stop management of an MPCC vessel due to lack of funding

As outlined under impacts above, strong supplier payment practices are essential to MPCC for ensuring supply chain reliability and maintaining business stability. Failing to pay technical managers because of lack of funding could lead to operational disruptions, including the inability of MPCC to manage Company vessels and fulfil other client contracts. Over time, this could in turn weaken cash flow and impact MPCC's long-term financial stability and reputation.

MPCC has established strong supplier payment practices, earning the technical managers' trust in its financial reliability, thereby minimizing the likelihood of this risk occurring. Additionally, implementing streamlined communication channels further helps to mitigate this risk.

### Corruption and bribery – Money laundering risk due to the nature of the business

Due to the nature and history of the shipping industry, there is an inherent risk of money laundering in MPCC's own operations. The complexity of cross-border transactions, the cash-based nature of certain operations, and inadequate controls can create vulnerabilities if not properly mitigated. Other cases of corruption or bribery in MPCC's operations are also risks for the Company. For MPCC, the financial impact could include reputational damage, regulatory fines, and restricted access to capital. In severe cases, especially for a publicly listed company such as MPCC, the Company's right to operate could be jeopardized.

To mitigate and reduce this financial risk, MPCC relies on a comprehensive framework of policies, governance structures, and monitoring mechanisms, as well as employee training.

# Impact, Risk and Opportunity Management

## G1-1 Business conduct policies

MPCC's approach to business conduct is anchored in its robust governance practices, which establish clear standards for ethical operations and define expectations for employees, suppliers, business partners and stakeholders. These practices align with internationally recognized principles and frameworks to ensure transparency and accountability across all aspects of its operations.

Each policy is approved by the Board of Directors, while the Chief Compliance Officer is responsible for implementation, integration into corporate governance and decision-making, and conducting an annual review to drive continuous improvement.

### Code of conduct

MPCC's Code of Conduct serves as a comprehensive guide to business conduct for all employees and the Company's affiliates. It establishes that all employees are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, in line with MPCC governing documents. The Code of Conduct outlines key objectives the Company follows to uphold the highest ethical standards across all operations including compliance with all applicable laws and governmental rules and regulations in the countries in which it is operating. These objectives include strict adherence to health and safety, labor and human rights, prevention of corruption and money laundering, ensuring fair competition and maintaining a positive workplace with an inclusive working environment.

The Code of Conduct applies to all entities controlled by the Company and all employees, directors, officers and agents of the Company. Each individual employee is ultimately responsible for their compliance with the Code of Conduct and every manager will also be responsible for administering the Code of Conduct as it applies to employees and operations within each manager's area of supervision. When such managers in MPCC detect irregularities in relation to potential violations of laws or the regulations of the Code of Conduct, the matter is handled in accordance with the Code of Conduct's instructions for reporting violations. To solidify the Company's efforts to uphold the highest standards possible, the Code of Conduct aligns with internationally recognized principles like the UN Conventions on Human Rights, the ILO Conventions, and the Norwegian Working Environment Act.

Several communication channels are utilized to make the Code of Conduct available to all employees and stakeholders. Employees are required to complete mandatory ethics and compliance training and refer to the Code in their day-to-day work.

All employees or hired personnel who become aware of a breach of the Code are obligated to report the matter through their reporting line of choice. Breaches could be reported to immediate supervisors

or higher management, either by themselves or through an employee representative, safety representative, colleague or lawyer. Internal and external whistleblowing channels are also available, as outlined in the section below.

### Sustainable Procurement Policy

MPCC's Sustainability Procurement Policy outlines the Company's decision-making process when procuring for goods and services.

The main objectives of the policy are to:

+ Integrate sustainable procurement by prioritizing suppliers with strong environmental, social, and governance (ESG) practices.
+ Identify areas of higher risk and influence within its supply chain and increasingly engage with suppliers in those areas to stimulate improving environmental performance at those points.

This policy applies to everyone at MPCC and its subsidiaries and to the purchase of goods and services in general.

### Protection of whistleblowers

The Company's policy for whistleblower protection is outlined in MPCC's Code of Conduct. The Company's whistleblowing mechanism is available to all employees, hired personnel and contractors, subcontractors and board members, to ensure irregularities are reported safely and confidentially. The whistleblowing procedures adhere to the highest standards of protection for whistleblowers, including those outlined in Directive (EU) 2019/1937 and the Norwegian Working Environment Act.

Anonymous reporting for employees, business partners or external stakeholders is available via the whistleblowing mechanism and accessible via the Company's website. This platform enables anonymous reporting and provides comprehensive guidelines on how to report misconduct, as well as details on how reports are handled, including the processing of personal data. Employees have the additional option to report irregularities directly to their immediate supervisor, the Executive Management or a member of the Board, unless the Code of Conduct directs otherwise.

All reports submitted through the whistleblowing mechanism are carefully examined and managed by the function best equipped to address the issue effectively. MPCC provides guidance and support to both whistleblowers and staff receiving reports to ensure their proper handling. Employees are encouraged to seek advice from their supervisor or MPCC's general counsel for guidance on how to report and handle specific situations. Management and members of staff receiving reports are expected to familiarize themselves with the instructions for handling whistleblowing reports. Training in relation to the processing of whistleblowing reports is provided on an ongoing basis.

MPCC has implemented robust measures to safeguard whistle-blowers against retaliation, ensuring they are protected from disciplinary actions, harassment, discrimination, or other adverse consequences related to their reports. Retaliation is explicitly prohibited and includes actions such as threats, demotion, dismissal, or social exclusion. The Company is committed to thoroughly investigating any claims of retaliation and taking appropriate corrective actions to address them, should they occur.

| | |
|---|---|
| Trial runs of the whistleblowing channel | 1 |
| Cases reported through the whistleblowing channel | 1 |
| Cases assessed as legitimate (according to Code of Conduct) related to corruption or bribery | - |
| Comment | The anonymous whistleblower reported an incident on MV AS Angelina where cargo operations were ongoing with two crew members "on top of moving crane without proper PPE and safety harness". Case closed. |

### Anti-Corruption Policy

The policy lays down the Company's principles with regard to anti-corruption. The policy applies to everyone at the company and its subsidiaries and MPCC expects the policy to be followed by its ship managers, contractors, temporary personnel, and those who act on behalf of or represent it and third-party personnel, throughout the company's supply and value chains.

MPCC enforces a zero-tolerance policy for corruption, money laundering, price-fixing, and other anti-competitive behaviors. MPCC strictly prohibits both active and passive corruption, mandates transparency in gift-giving and business expenses, rejects political contributions, and holds agents and representatives accountable for compliance with anti-corruption laws.

To uphold these principles, MPCC ensures that employees, contractors, and suppliers are fully aware of its anti-corruption

policy and Code of Conduct and expects them to educate their personnel accordingly.

The company provides anti-corruption training, conducts due diligence on acquisitions and investments, and complies with all relevant local, national, and international regulations, including the FCPA, UK Bribery Act, and OECD Anti-Bribery Convention.

MPCC also implements risk mitigation measures to prevent business partners from engaging in corrupt activities and rejects transactions where money laundering risks cannot be excluded.

### Business conduct training

All employees, including the Executive Management, receive regular mandatory Ethics Policy and compliance training. The training provides comprehensive coverage of critical areas, including anti-corruption, anti-bribery, fair competition, supply chain integrity and reporting mechanisms.

MPCC regularly distributes training courses on key topics and critical areas such as anti-bribery, anti-money laundering, and data protection, as well as new and updated policies covering areas like Cyber Security, Antitrust, Anti-Fraud, and Sanctions Compliance. In 2024, two training courses and four new policies were published. This is an average publication frequency of two months and it is planned to maintain at least this frequency in the future. These courses and policies are made available through the online platform MetaCompliance, ensuring employees stay informed and up to date on critical compliance matters.

This ongoing initiative will continue with the planned development and rollout of a human rights training course in the first half of 2025, followed by additional courses on business ethics and other essential topics. Looking ahead, in addition to introducing new courses and policies, the company intends to gradually circulate existing policies through MetaCompliance, requiring employees to confirm their understanding. While these policies are already accessible online at any time, the company also plans to develop corresponding training materials and quizzes, where relevant, to ensure employees fully comprehend and adhere to these policies.

The objective of the training is threefold: to provide employees with the knowledge and tools necessary to uphold ethical business practices, to ensure they are well-versed in applying these practices in their daily work, and to foster a clear understanding of their responsibilities regarding compliance with laws, regulations, and ethical standards.

## G1-1 Approach to corporate culture

MPCC builds and strengthens its corporate culture by continuously enhancing business conduct, governance, and ethical decision-making. The Company integrates key elements such as whistleblowing mechanisms, supplier relationships, and anti-corruption initiatives to uphold a strong ethical foundation.

MPCC promotes its values through mandatory compliance training, open communication, and a zero-tolerance policy for discrimination and harassment. Management fosters a strong culture of ethical business conduct by acting as role models, encouraging transparency in ethical dilemmas, and safeguarding employees who report irregularities against retaliation.

The corporate culture is also promoted through a range of policies. In addition to the Code of Conduct, a key policy in this work is the Human Capital Policy. This policy is designed to foster a professional, inclusive, and positive workplace that promotes high employee engagement and personal development, thereby supporting a positive corporate culture.

Through these policies, governance frameworks, and training programs, MPCC nurtures a corporate culture rooted in integrity, compliance, and ethical decision-making at every level of the organization.

The Company evaluates its corporate culture by continuously updating its policies (as referred to above in the Policies section) to reflect changes in laws and regulations, and by conducting thorough follow-up on all reported irregularities to address concerns effectively.

By doing so, MPCC ensures that the Company maintains a workplace based on integrity, inclusivity and accountability.

## G1-2 Approach to relationship with suppliers

MPCC treats all of its suppliers in accordance with the legally binding contract they have with each individual supplier and any relevant laws or regulations. To ensure continuity and quality within its supply chain the Company aims to treat all of its suppliers fairly

and transparently. The Company does not have a separate policy governing the payment of suppliers.

### Approach

In the supply chain, the focus area for MPCC is connected to human rights. The Company follows up with suppliers to ensure that they uphold the Company's zero-tolerance policy for human rights violations and indecent working conditions. MPCC uses the Business Partner Guideline (described in more detail in S2) as a tool to ensure the suppliers operate in accordance with fundamental human rights.

MPCC monitors this zero-tolerance policy through technical managers, who conduct supplier audits in cases where there is reasonable and concrete evidence of a potential human rights violation or failure to provide adequate working conditions.

If an existing supplier is found to be in violation of the Business Partner Guideline, MPCC has the right to either issue formal warnings or terminate the contract, depending on the individual case.

### Selection of suppliers

In line with MPCC's Sustainable Procurement Policy (detailed in the policy section above), the Company is committed to prioritizing suppliers that have integrated sustainable and ethical practices within their operations and actively promote these standards throughout their own supply chains. Additionally, the Company aims to identify high-risk areas within its supply chain and engage more closely with suppliers in those areas to drive improvements in environmental performance where they are most needed.

To achieve the Company's sustainable procurement goals, MPCC prioritizes suppliers that align with the ESG policies, ensuring responsible employment, ethical business practices, and fair trade. Suppliers are expected to respect internationally recognized human rights, adopt a precautionary approach to environmental challenges, and actively work to reduce pollutants, GHG emissions, and $SO_x$. Additionally, the Company upholds a zero-tolerance policy for bribery, corruption, money laundering, and anti-competitive behavior, while prioritizing personnel safety over commercial interests.

It should be noted that in supplier selection, technical managers typically choose suppliers essential for vessel operations, except in cases of drydocking. Technical managers are required to engage only with suppliers who confirm adherence to MPCC's Business Partner Guideline, ensuring alignment with MPCC's corporate responsibility standards. This includes compliance with fundamental human rights, as outlined in the United Nations Universal Declaration of Human Rights and ILO standards, as well as strict adherence to MPCC's ESG policies, which cover areas such as anti-corruption, fraud prevention, antitrust, cybersecurity, environmental protection, health and safety, human rights, ship recycling, and sustainable procurement.

Looking ahead, MPCC will audit and engage ship recycling companies to ensure that standards are maintained, and trust is kept between all partners. MPCC expects governance requirements for value chain stakeholders, such as shipyards, to increase with the gradual roll out within the shipping sector of supply chain legislation such as the Norwegian Transparency Act and the Corporate Sustainability Reporting Directive. MPCC closely monitors these developments and has established robust policies and reporting frameworks in compliance with these obligations, including its Ship Recycling Policy and its annually updated Transparency Act Statement.

## G1- 3 Prevention and detection of corruption and bribery

MPCC takes a firm position against corruption in any form, and actively works to prevent, avoid and detect all forms of corruption. The main principles related to corruption and bribery are set out in the Code of Conduct and the Anti-Corruption Policy (see G1-1 above for more information on both policies).

The procedures to prevent, detect and address instances of corruption and bribery include strict prohibitions against offering, accepting or requesting improper advantages, managing conflicts of interest, and maintaining transparency in dealings related to gifts, hospitality and donations.

All MPCC employees are required to adhere to the Company's principles for ethical business practices and are not allowed to provide for, request or receive anything that can be deemed a potential bribe or defined as potentially corrupt. They are required to avoid conflicts of interest, report suspicions of corruption through established whistleblowing channels, and to comply with all internal policies governing gifts, hospitality, and donations.

MPCC encourages its employees to actively question behavior or decisions that appear unethical or inconsistent with the Code of Conduct and to report any suspicions of corruption or bribery

through the established whistleblowing channels (See G1-1 above for more information on the whistleblowing channels available).

In addition to its Code of Conduct and the Anti-Corruption Policy, the Company also has an Anti-Fraud Policy in place. Therein the company defines "fraud" as "dishonestly obtaining an advantage, avoiding an obligation or causing a loss to another party" and points out in the policy that the term "fraud", among others, includes activities such as corruption and bribery.

Accordingly, the relevant procedures can be found in the Anti-Fraud Policy. The key findings on procedure state that:

+ MPCC takes all allegations of fraud seriously, regardless of the position, title, or tenure of the individuals involved. All employees are expected to remain vigilant and report any suspected fraudulent activity to management or the Compliance Department.
+ The company will promptly investigate any suspected fraud or dishonest activities affecting MPCC or its business partners and will take appropriate disciplinary or legal action, including termination of employment, restitution, or referral to authorities for prosecution. Additionally, MPCC will record, monitor, and analyze all cases of suspected or confirmed fraud to prevent future occurrences.
+ Employees must report any reasonable concerns regarding fraudulent or corrupt activities involving employees, board members, contractors, vendors, or other associated parties to the Compliance Department, CFO, or CEO. Upon verbal notification of a possible fraud, the Compliance Department must immediately inform the CFO, who will consult the CEO in cases of significant financial loss or potential reputational damage. The Chief Compliance Officer (CCO) maintains a fraud log, documenting all reported suspicions, actions taken, and outcomes. Major incidents are escalated to the CEO as soon as practical.
+ For each investigation, the CEO will appoint a Head of Investigation—typically the Chief Compliance Officer—based on the severity and financial impact of the case. The Head of Investigation is responsible for developing an action plan with clear timeframes and periodic reviews, seeking support from relevant experts such as external auditors, legal advisors, and technical specialists while maintaining overall accountability.
+ The Head of Investigation should have the necessary authority (i.e. the appropriate rank and experience) to enable him/her to properly discharge these duties and should be independent from the matter in question.
+ Following the investigation, a summary report detailing the findings and lessons learned will be circulated to key stakeholders, ensuring that control measures and processes are improved to prevent future fraud. Where fraud has occurred, MPCC will review and strengthen its systems and procedures to minimize the risk of recurrence.

### The process to report outcomes to administrative, management and supervisory bodies

In cases of fraud the relevant investigation process as detailed in the Anti-Fraud Policy involves the following steps:

*Reporting and Initial Notification:*

+ Any suspected fraud must be immediately reported to the Compliance Department.
+ Upon receiving verbal notification, the Compliance Department must inform the CFO, who will escalate the matter to the CEO if the potential loss is significant or if the incident could lead to adverse publicity.

*Case Logging and Documentation:*

+ The Chief Compliance Officer (CCO) maintains a log of all reported suspicions, including minor cases or those not investigated.
+ The log includes details of actions taken and conclusions reached.
+ Significant cases are reported to the CEO as soon as practical.

*Staff Interviews and Disciplinary Procedures:*

+ If an investigation involves an employee, the investigators must consult the HR department for guidance on employment law, company policies, and disciplinary procedures.
+ Disciplinary action will be handled consistently, regardless of the individual's position or tenure within the company.

*Legal and Disciplinary Actions:*

+ Following an investigation, the Board of Directors will determine if legal or disciplinary action is necessary.
+ If no criminal act is found, the CCO, CEO, HR Department, and relevant line manager will assess whether internal disciplinary measures are appropriate.

*Escalation to Authorities:*

+ If initial investigations suggest a criminal act has occurred, the CEO or CFO will immediately contact law enforcement (police or relevant federal agency).
+ The company will follow law enforcement guidance in proceeding with the investigation.

The Code of Conduct, Anti-Corruption Policy and Anti-Fraud Policy outlining the procedures for addressing corruption and bribery, is accessible to all employees via the intranet as well as through the Company's website. Employees are required to familiarize themselves with their contents. In addition, anti-corruption and anti-bribery are part of the company's online mandatory training program on business conduct. (See G1-1 for more information)

At MPCC, the management team and functions within procurement and contracting are at greatest risk of being targeted for undue influence, corruption or bribery. This includes individuals acting as general managers, purchasing managers, and employees with authority to enter contracts. 100% of functions-at-risk were covered by training programs related to corruption and bribery. The training includes how to identify and act in situations involving corruption, such as being offered private services or kickbacks.

### Targets

MPCC has not established measurable and outcome-oriented targets, but has nevertheless established five qualitative goals to guide the Company's efforts connected to business conduct going forward:

+ ESG policies to be updated and made available on website
+ Develop and implement ESG digital course for internal and external stakeholders
+ Annual high quality ESG disclosures based on European Sustainability Reporting Standards (ESRS)
+ Identify, assess, integrate and monitor anti-corruption risks
+ Implement annual testing and training of MPCC whistleblower system.

## G1- 4 Incidents of corruption and bribery

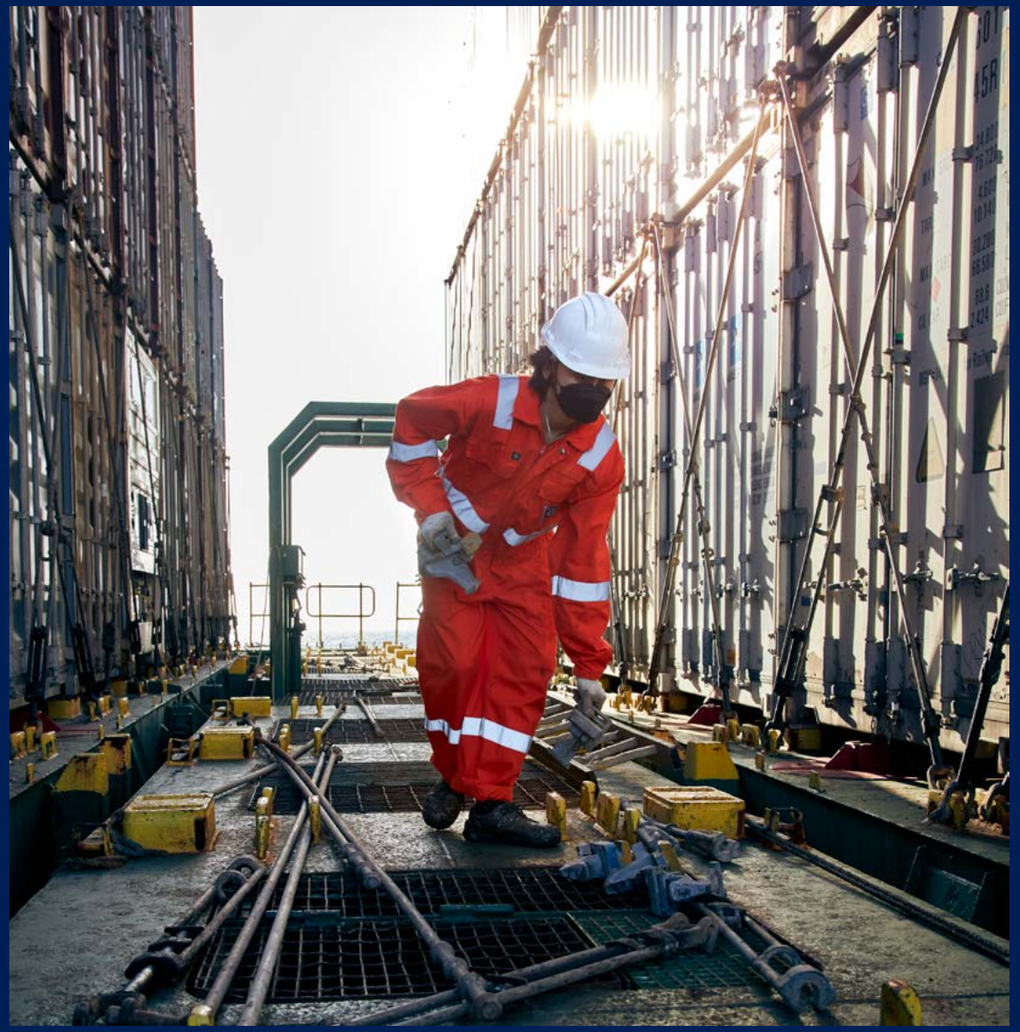
There have been no reported incidents of corruption or bribery at MPCC in 2024. Consequently, no employees have been convicted, nor have any fines been levied on the company. As a result, no corrective actions have been necessary. Additionally, no public legal proceedings related to bribery or corruption have been initiated against MPCC, its subsidiaries or its employees during this period.

## G1-6 Payment practices

Throughout 2024, the Company has taken an average of 16 days to pay an invoice from the date when the contractual or statutory term of payment begins. This adheres MPCC's maximum agreed payment term of 60 days. Most payments are completed within 25 days and 78% of payments are aligned with these standard terms. There are currently no outstanding legal proceedings related to late payments.

# G1 Accounting policies

| ESRS DR | PARAGRAPH(S) | DATAPOINT / METRIC | ACCOUNTING PRINCIPLE |
|---|---|---|---|
| G1-1 | 10 c | How MPCC protects whistle-blowers | All reports are handled following the approved guidelines for managing whistle-blower reports under the Code of Conduct. The company's Chief Compliance Officer (who is also Co-CEO and Chief Financial Officer) holds ultimate responsibility for the implementation of the Code of Conduct and the Whistleblower Hotline. |
| G1-4 – MDR M | 77 a | Disclosure of methodologies and significant assumptions behind metric | As long as there is no indication to the contrary or reason to conduct specific investigations, MPCC assumes that all employees comply with the provisions of its Anti-Corruption Policy and Code of Conduct, which explicitly addresses anti-corruption.<br><br>The Company is committed to addressing any alleged or confirmed cases of corruption and bribery brought to its attention, regardless of the reporting channel. This includes, but is not limited to, reports received through the whistleblower channel and internal findings. However, in the absence of any indications of bribery or corruption, MPCC recognizes the practical challenges of measuring such occurrences, whether onboard its vessels or onshore. |
| G1-4 | 24 a | Legal action (ESRS wording= Number of convictions for violation of anti-corruption and anti-bribery laws) | The number of legal actions initiated during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation. |
| G1-4 | 24 a | Amount of monetary losses | Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations |
| G1-4 | 24 a | Number of confirmed incidents of corruption or bribery | Determined by number within the reporting year. |
| G1-4 | 25 b | Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents | Determined by number within the reporting year. |
| G1-4 | 25 c | Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery | Determined by number within the reporting year. |
| G1-6 | 33 a | The average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days | The Company has not used representative sampling to calculate this average.<br><br>The data on payment practices has not been validated by an external body other than the assurance provider. |



# GREEN AND SUSTAINABLE FINANCE

MPC Container Ship ASA is committed to shaping a greener future for global shipping. As part of our mission to drive sustainable growth within the maritime industry, we have developed a comprehensive Green- and Sustainable-Linked Finance Framework. The initiatives align with our core values of environmental responsibility and long-term resilience, addressing the urgent need to reduce the carbon footprint of international shipping.

Through our Green- and Sustainable-Linked Finance Frameworks we aim to leverage green financing solutions to support eco-friendly innovations, enhance operational efficiency, and advance the decarbonization of our fleet. By investing in cleaner technologies and sustainable practices, we are not only future proofing our operations but also contributing to a more sustainable maritime sector.

# GREEN LOAN PROGRESS REPORT

A subsidiary of MPCC has entered into a USD 54.5 million term loan facility agreement dated 19 April 2024 with Deutsche Bank covered by SINOSURE credit insurance (Agreement) for its two dual-fuel methanol new built 1,300 TEU container vessels (Project). The Agreement covers pre- and post-delivery funding. Delivery of the first vessel took place in January 2025, with the second vessel scheduled during Q2 2025. They will be employed under 15-year time charter contracts with North Sea Container Line (NCL). The Agreement matures 12 years after delivery in 2037. Notably, the two vessels incorporate dual-fuel engines and are designed to operate on green methanol.

In recognition of the environmentally sustainable features of the vessels, the lender has classified this financing as Sustainable Finance, as the funds will be utilized for a project that aligns with the eligibility criteria outlined in Deutsche Bank's own Sustainable Finance Framework.

The Project is going to receive significant financial support from Norwegian governmental and industry initiatives aimed at promoting sustainable practices. Specifically, it has been awarded NOK 13.7 million from ENOVA, the Electrification of Maritime Transport program under the Norwegian Ministry of Climate and Environment, subject to evidencing additional cost incurred for the sustainable features of the Project.

In accordance with the Green Loan Principles (GLP) developed by the Loan Market Authority (LMA) recommending borrowers to engage external review providers to assess the alignment of their green loan or green loan program with the four core components of the GLP, MPCC has obtained a second party opinion confirming the alignment of the Agreement with the GLP by the American Bureau of Shipping (ABS).

## Loan overview

| ITEM | DETAILS |
|---|---|
| Loan Name: | Term Loan for Two Dual-Fuel Methanol Newbuildings |
| Borrower: | MPCC Greenbox AS<br>(90% owned by MPC Container Ship ASA) |
| Guarantor | MPC Container Ships ASA |
| Lender(s): | Deutsche Bank AG |
| Signing Date: | 19 April 2024 |
| Credit Insurance | China Export & Credit Insurance Corporation (Sinosure) |
| Maturity Date: | 2037 (12 years after delivery) |
| Total Loan Amount: | USD 54.5 million |
| Amount Drawn to Date: | USD 15.6million |
| Use of Proceeds: | (Partly) fund the contract prices in the relevant building contract (Construction of two 1,300 TEU dual-fuel methanol container vessels with energy-saving and emissions-reducing technologies) |

## Green Loan Allocation Report

In line with the GLP and the terms of the Agreement, the proceeds of the USD 54.5 million loan have been exclusively allocated to finance the acquisition costs for the construction of two state-of-the-art dual-fuel methanol feeder vessels. These 1,300 TEU vessels are a cornerstone of MPC Container Ships ASA's decarbonization strategy and are equipped with a comprehensive suite of energy efficiency and emissions reduction technologies. This section provides a breakdown of how the loan funds have been allocated to construction of the vessels.

Breakdown of how loan proceeds have been allocated:

| CONSTRUCTION MILESTONE | NCL VESTLAND | NCL NORDLAND | TOTAL | DESCRIPTION/ACTIVITIES FUNDED |
|---|---|---|---|---|
| Keel Laying | 3,890,000 | 3,890,000 | 7,780,000 | Vessels are built in a series of pre-fabricated, complete hull sections. Keel laying is the first joining of these sections, or the lowering of the first section into place in the building dock. |
| Launching | 3,890,000 | 3,890,000 | 7,780,000 | The process of transferring a new built vessel from the building dock onto the water. |
| **Total** | **7,780,000** | **7,780,000** | **15,560,000** | |

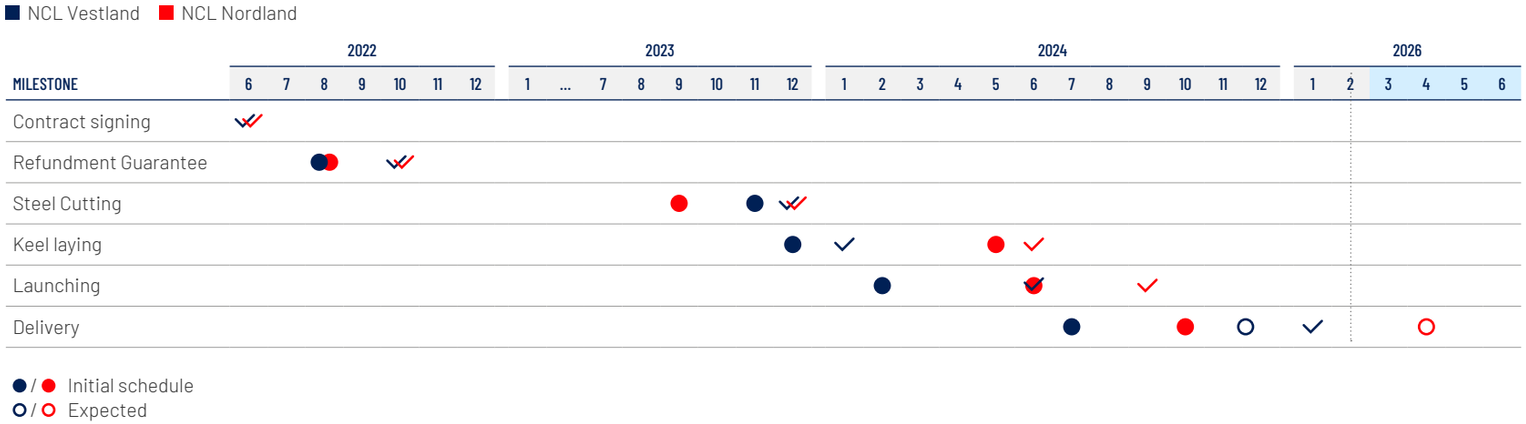
## Project Progress & Implementation Update

During the reporting period, MPC Container Ships ASA advanced the implementation of the Project. The vessels are being built at Taizhou Sanfu Ship Engineering Co. Ltd. and are designed to meet and exceed stringent environmental performance standards, with state-of-the-art technologies, including methanol dual-fuel engines, battery energy storage, shore power compatibility, and a range of energy efficiency technologies.

Key milestones in the construction process of NCL Vestland occurred, with the keel laying completed in January 2024 and the launching in June 2024. The keel laying of NCL Nordland took place in June 2024, with the vessel's launching completed in September 2024.

As of Q4 2024, the Project is slightly delayed (first vessel has been delivered in January 2025, the second is expected to be delivered in Q2 2025), with both newbuildings in a final phase of construction. The hull fabrication and structural assembly for both ships have been completed, and core mechanical systems, such as propulsion shaft lines and rudder arrangements, are already installed. Major components of the dual-fuel propulsion system — including the MAN 6S50ME-C9.6LGIM Tier III engines — have been installed, and detailed planning for the integration of the battery packs and shore power interfaces has been finalized.

### PROJECT TIMELINE



In Q4 of the reporting period 2024, the project is entering the outfitting and commissioning phase. The remaining steps until delivery include installing and testing the dual-fuel methanol engines, integrating the 250 kWh battery storage systems, connecting shore power interfaces, and completing electrical and navigation outfitting. These activities will be followed by regulatory inspections, sea trials, and the final handover to the owner.

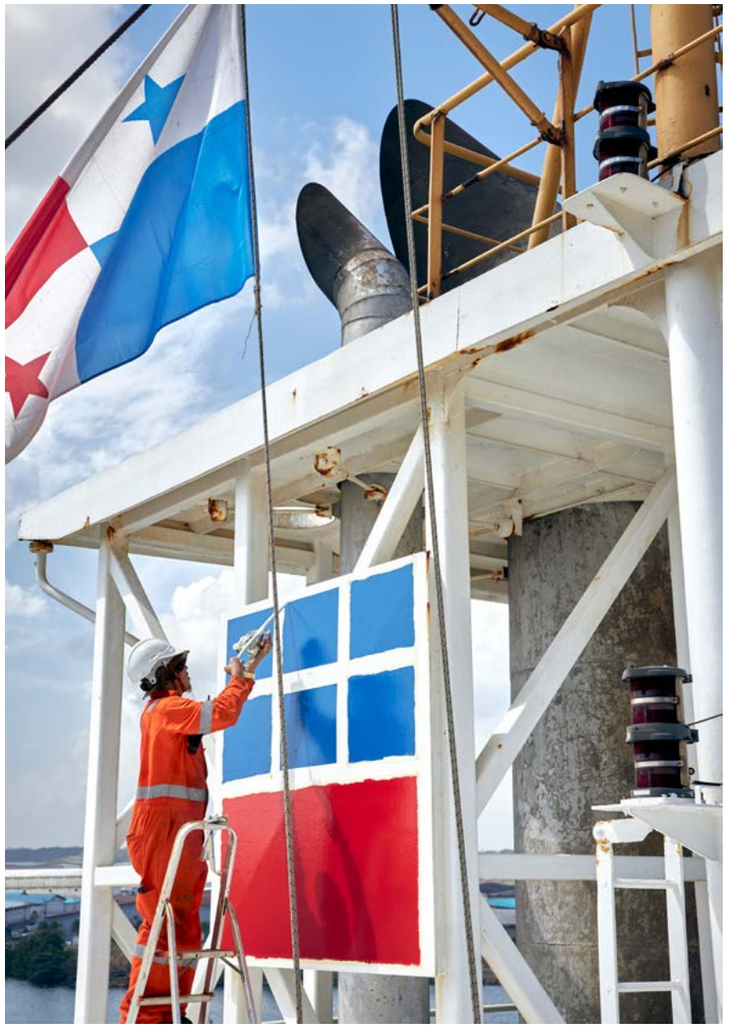
## Environmental Impact Report

As of the end of the reporting period, the two dual-fuel methanol feeder vessels — NCL Vestland and NCL Nordland — have not yet been delivered and are currently in their final stage of construction. Consequently, no operational environmental impact data is available at the end of the reporting period.

Nevertheless, both vessels are designed with a strong environmental profile aligned with MPC Container Ships ASA's decarbonization trajectory and the objectives of the Green Loan Principles.
Once in service, the vessels are expected to deliver substantial environmental benefits across multiple impact areas, including:

I. **Greenhouse Gas Emissions Reduction:** The use of renewable methanol and advanced dual-fuel engines is projected to reduce $CO_2$ emissions by up to 95%, depending on the feedstock and production pathway of the renewable methanol.
II. **Air Pollution Reduction:** Emissions of $NO_x$, $SO_x$, and particulate matter (PM) are expected to decrease by up to 80%, 99%, and 95% respectively compared to conventional HFO/MGO fuels.
III. **Energy Efficiency:** The vessels are designed with an Energy Efficiency Design Index (EEDI) 33.5% below the required threshold, meeting EU Taxonomy criteria and improving fuel efficiency.
IV. **Port Emissions Reduction:** With onboard battery packs and shore power capability, both vessels will be able to operate with zero emissions during port stays where shore power infrastructure is available.

Full quantitative environmental impact reporting will commence following vessel delivery and entry into commercial operation. MPC Container Ships ASA will include relevant performance metrics and impact data in future annual green financing and ESG reports, in accordance with its reporting commitments under the Green Loan.



# SUSTAINABILITY-LINKED BOND PROGRESS REPORT

In September 2024, MPCC issued a senior unsecured sustainability-linked bond (SLB), reinforcing its commitment to driving sustainability in the shipping industry.

This Progress Report provides an update on MPCC's performance against the defined Sustainability Performance Target (SPT) within the SLB, demonstrating transparency and accountability in meeting its sustainability commitments. The report outlines key developments, actions taken, and the company's progress towards achieving the environmental objectives embedded in the bond framework.

MPCC´s SLB is structured with a clear SPT linked to the Company´s decarbonization strategy, incentivizing measurable progress towards reducing the fleet average greenhouse gas (GHG) intensity in alignment with industry and international regulatory climate goals by the IMO.

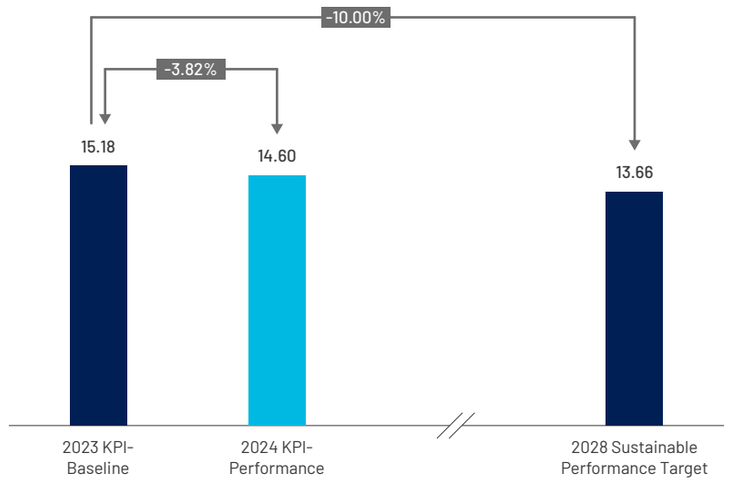
## Performance of KPI

As part of MPCC's SLB, the Company has determined the fleet average Annual Efficiency Ratio (AER) on a well-to-wake basis, as the Key Performance Indicator (KPI) to track its decarbonization progress. The KPI follows the calculation and accounting principles of the GLEC Framework for Logistics Emissions Accounting and Reporting in its 3rd version. The AER is expressed in grams of $CO_2$ per deadweight ton-mile ($gCO_2$/dwt-nm) and provides a standardized metric to evaluate the carbon intensity of the fleet in relation to the transport work performed. This KPI reflects MPCC's most material sustainability objective — reducing its greenhouse gas emissions — and is aligned with global climate targets, including the 2023 IMO GHG Strategy and the Paris Agreement.

The baseline year for this KPI is 2023, when MPCC recorded a fleet-wide AER of 15.18 $gCO_2$/dwt-nm, as validated by the American Bureau of Shipping (ABS).

The SPT set within the SLB aims for a 10% reduction in this value by the target year 2028, equating to an average annual reduction of approximately 2% over the five-year period. This chapter as well as Figure 1 highlights the 2024 KPI performance in relation to the baseline and assesses the Company's progress to achieve the SPT as well as along its decarbonization trajectory.

FIGURE 1: FLEET AVERAGE AER ON A WELL-TO-WAKE BASIS

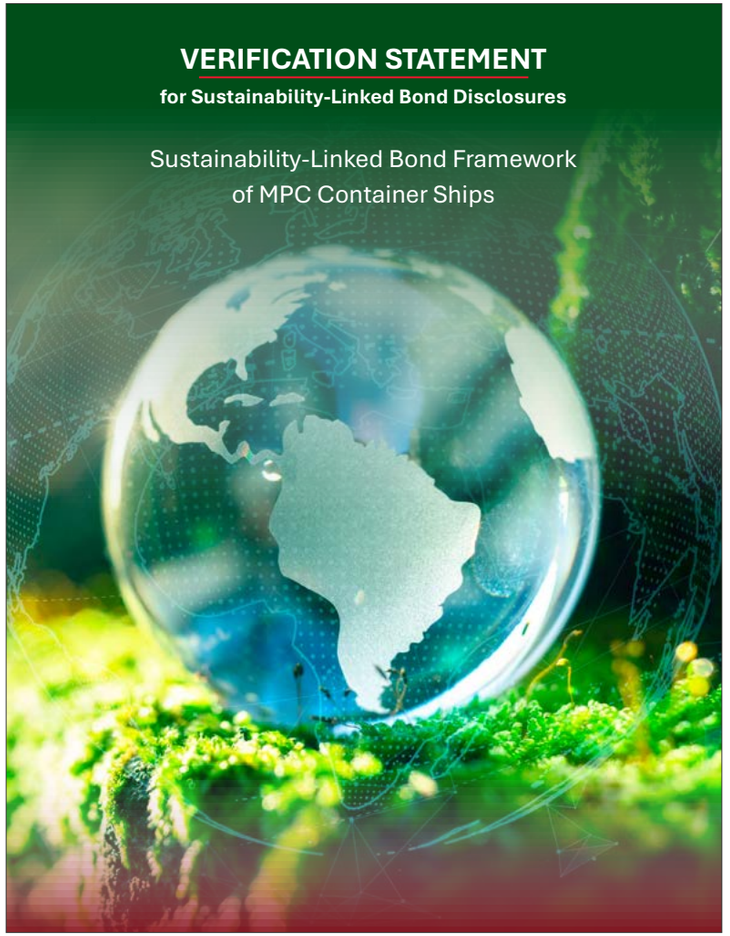


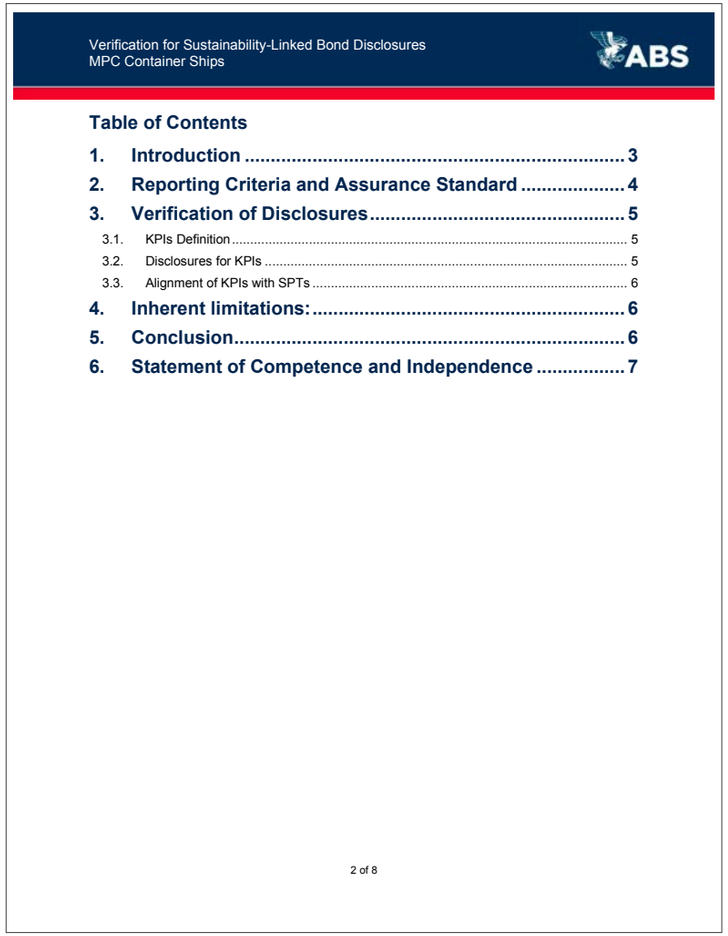
In the first reporting year of the SLB, MPCC has demonstrated measurable progress towards the SPT and its decarbonization target. According to the independent verification conducted by ABS, the fleet-wide Well-to-Wake AER decreased from 15.18 $gCO_2e$ per tonne-mile in 2023 to 14.60 $gCO_2e$ per tonne-mile in 2024. This reflects a 3.82% reduction in carbon intensity compared to the baseline year, thereby exceeding the indicative annual reduction trajectory of 2% set out in the SLB. ABS concluded that the KPI performance for 2024 is in alignment with the expectations and requirements of the Sustainability-Linked Finance Framework, affirming MPCC's commitment to its climate strategy and alignment with the IMO's decarbonization goals.

## Explanation of KPI Evolution

The positive development of MPCC's fleet-wide AER between 2023 and 2024 reflects the company's strategic and ongoing investments in efficiency enhancing measures. Key drivers of the KPI improvement include the intensive retrofit and modernization program across the fleet, focusing on energy-efficiency technologies such as VFD, CJC filters, LED lights and engine upgrades as well as hydrodynamic measures like optimized propellers/boss cap fins, pre swirl devices, new bulbous bows and hull coatings. In parallel, MPCC's fleet renewal strategy has led to the gradual integration of more modern, fuel-efficient vessels with inherently lower carbon intensity. Additionally, the increased uptake of low greenhouse gas (GHG) fuels, including the use of biofuels and the initial operation of dual-fuel methanol-ready vessels, has further contributed to reducing well-to-wake emissions. Together, these initiatives have enabled MPCC to exceed its indicative annual reduction target and strengthen its trajectory toward achieving the 2028 SPT.

## Verification Statement



Verification for Sustainability-Linked Bond Disclosures
MPC Container Ships

ABS

Table of Contents



2 of 8

## Verification Statement



### 1. Introduction

The American Bureau of Shipping ("ABS") is committed to being a recognized leader for new technology development and assessment and serving as a trusted technical advisor to the marine industry. These pillars have formed the foundation for the success of ABS for more than 150 years, and, more importantly, positioned the organization to provide the practical solutions needed for the future. With nearly 3,500 technical professionals located around the world, the ABS team has the experience, knowledge, and professional judgment to assist our members and clients worldwide.

ABS helps organizations to achieve their sustainability goals. ABS has been assisting its clients in their pathway to sustainable economy with a wide range of services such as technology selection, benchmarking and target setting, regulatory compliance documentation, carbon accounting and verification, energy audits, sustainable finance and more.

For sustainability-linked bonds, it is a requirement of the Sustainability-Linked Bond Principles (SLBP) that borrowers seek independent and external verification by a qualified external reviewer with relevant expertise of their performance level against each Sustainability Performance Target (SPT) for each Key Performance Indicator (KPI), at least once a year.

ABS has been engaged as an independent third party to review and verify (providing a limited assurance statement) the KPIs defined in the Sustainability-Linked Finance Framework by MPC Container Ships (MPCC), as per their reporting and disclosure obligations.

ABS is well-positioned to offer limited assurance to MPCC with regard to the SPTs set forth in their Sustainability-Linked Bond Facility for the KPI defined therein. ABS will leverage on its extensive knowledge on Environmental, Social and Governance Practices, Emissions Verification and GHG Accounting to review the KPIs and provide an independent third-party limited assurance statement regarding the SPTs defined for the selected disclosures as indicated in the Sustainability-Linked Bond.

The independent limited assurance statement encompasses three key elements, summarized below for consideration.

- Three Party Relationship
- Subject Matter
- Evaluation Criteria





### 2. Reporting Criteria and Assurance Standard

This limited assurance engagement has been performed in accordance with the recommendations provided in ISAE 3000. We have also taken into consideration the Guidelines for Green, Social, Sustainability and Sustainability Linked Bonds External Reviews when conducting our limited assurance procedures.

The procedures conducted for this engagement were designed to provide a limited level of assurance.

The objective of this report is to provide a limited assurance statement on MPCC's Sustainability-Linked finance disclosures. MPCC has developed its framework based on the guidelines set forth by the International Capital Market Association (ICMA) Sustainability-Linked Bond Principles. The Sustainability-Linked Bond incentivizes the borrower to achieve material, ambitious, pre-determined, regularly monitored and externally verified sustainability objectives through Key Performance Indicators (KPIs) and Sustainability Performance Targets (SPTs). By seeking this limited assurance, MPCC aims to demonstrate its commitment to these principles.

The sustainability assurance scoping and planning stage includes the selection of sustainability information for a limited assurance exercise. Scoping for limited assurance involves looking at:

- The KPI defined within the scope of the Sustainability-Linked Bond Framework:
  - Fleet WtW Annual Efficiency Ratio (AER)
- The data sampled for each disclosure: The sample data will be tested in order to give the assurer confidence in the accuracy of the rest of the data.
- The performance level against the targets (SPTs).





### 3. Verification of Disclosures

#### 3.1. KPIs Definition

MPCC selected the sustainability metrics below for its KPI, as per their Sustainability-Linked Finance Framework:

- **WtW Annual Efficiency Ratio (AER):** as a metric of the annual emissions intensity of each vessel in the fleet, taken as a weighted average for the time each vessel remains under MPCC's ownership.

$$\overline{AER} = \frac{Annual\ Emissions}{DWT * Distance}\left[\frac{gCO_2}{tnm}\right]$$

- Only vessels owned by MPCC as of 31st December are considered.
- Based on the GLEC Framework v.3.0 WtW Carbon Factors

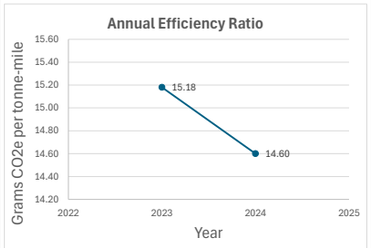
#### 3.2. Disclosures for KPIs

| KPIs | Details |
|---|---|
| **WtW Annual Efficiency Ratio (AER)** | 2024 Fleet WtW Annual Efficiency Ratio (AER): **14.60** grams CO2e per tonne-mile |

## Verification Statement



### 3.3. Alignment of KPIs with SPTs

| KPIs | Details |
|---|---|
| **WtW Annual Efficiency Ratio (AER)** | The development of AER from 2023 to 2024 is illustrated in the following figure.<br>  <br><br>The indicative reduction in the Sustainability-Linked Financing Framework is set at 2% for 2024 compared to 2023. The WtW Annual Efficiency Ratio (AER) of the fleet in 2024 has exceeded the target. Compared to the base year of 2023, the fleet achieved a reduction of 3.82%, surpassing the 2% Indicative Trajectory for 2024. |

### 4. Inherent limitations:

In providing our limited assurance conclusion, we relied on the information and documents provided to us by MPCC. To the best of our knowledge, there are no circumstances that would render such information or documents unreliable. Because of such reliance, there may be errors or irregularities which may not be detected.

### 5. Conclusion

ABS has reviewed MPCC's sustainability-linked finance disclosures. In our opinion, the KPI appears to be prepared in accordance with MPCC's Sustainability-Linked Finance Framework. No material issues have come to our attention that would cause us to believe otherwise.

This conclusion relates only to the selected information that we have verified and is to be read in the context of this Limited Assurance Report, in particular, the inherent limitations explained above.



Verification for Sustainability-Linked Bond Disclosures
MPC Container Ships

### 6. Statement of Competence and Independence

With this statement, ABS provides an independent and external verification of MPCC's KPI disclosures with the requirement of SLBP.

ABS's statement is intended to identify the level of alignment with the Sustainability-Linked Bond Principles adopted by the MPCC, assessing at the same time the selection of KPIs and the rationale and level of ambition of the SPTs as well as the reporting and verification obligations. To help MPCC in its efforts to ensure alignment with the Sustainability-Linked Bond Principles, ABS has received and reviewed relevant information, data, and facts provided by MPCC (Information) and relied on this information as the basis for rendering this statement. MPCC has represented that the information is materially true, accurate and complete and ABS is under no obligation to verify the same independently. ABS shall not be liable for any opinion rendered under this statement to the extent that it is based on or resulted from inaccurate or incomplete information, data and facts provided by or on behalf of MPCC whether due to error, omission or deliberate falsification.

ABS applies its own management standards and compliance policies for quality control and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. We have complied with the ABS Code of Conduct during the assessment and maintain independence where required by relevant ethical requirements. An independent team of sustainability assurance professionals carried out this engagement work. ABS was not involved in preparing statements or data included in the Framework except for this Statement. ABS maintains complete impartiality toward stakeholders during the assessment process.

ABS's report was prepared by ABS solely for the benefit of MPCC. Neither ABS, nor any person acting in ABS's behalf makes any warranty (express or implied), or assumes any liability to any third party, with respect to the use of any information or methods disclosed herein. Any third-party recipient of this report, by acceptance or use of this report, releases ABS from liability for any direct, indirect, consequential, or special loss or damage, whether arising in contract, tort (including negligence), or otherwise.

**American Bureau of Shipping**
Oslo
sustainability@eagle.org

Verification Statement Dated: 7th March 2025

| | |
|---|---|
| **Project ID** | 5482277 |
| **SA no** | QUO-42703-Z7R0F |
| **Date** | 7th March 2025 |



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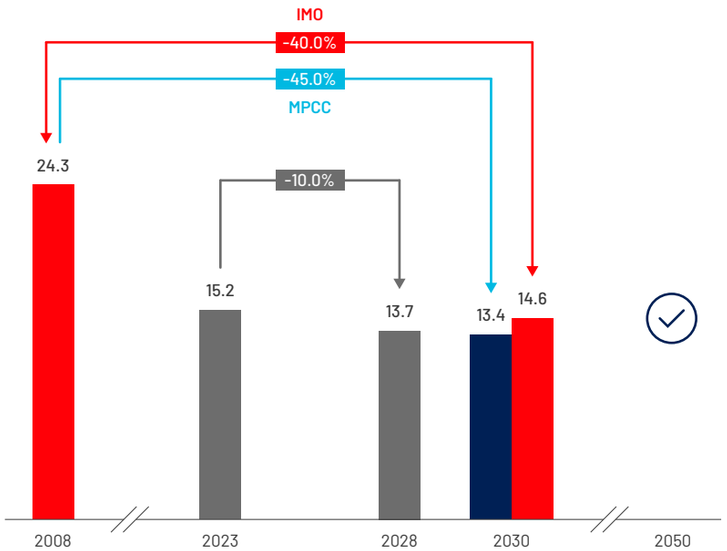
## Update of Sustainability Strategy

MPCC´s Well-to-Wake GHG Emission Intensity Trajectory is a crucial pillar of MPCC´s Sustainability Strategy. In December 2024 MPCC strengthened the Company´s GHG Emission Intensity Trajectory and thereby exceed the ambition level of the International Maritime Organization.

MPCC targets to significantly reducing our carbon footprint, with a target to reduce GHG emissions intensity by 45% by 2030 from a 2008 baseline on a well-to-wake basis and to net-zero by 2050, exceeding the IMO carbon intensity trajectory.

REVISED TARGET




In June 2023 the Global Logistics Emission Council (GLEC) published and updated Framework version 3.0 as a comprehensive methodology for calculating greenhouse gas (GHG) emissions across multimodal transport chains. With the updated Framework version 3.0 GLEC provides standardized guidelines to harmonize the measurement and reporting of emissions for freight and logistics activities. It aligns with international protocols, such as the Greenhouse Gas Protocol and the UNFCCC standards, and covers all transport modes, including road, rail, sea, and air. Version 3.0 enhances accuracy by incorporating recent advances in data collection, emission factors, and technological developments, such as electrification and alternative fuels. It also includes improvements to lifecycle assessments, providing a more holistic view of emissions from "well-to-wake" covering both direct and indirect emissions.

In 2024 MPCC adopted the GLEC Framework version 3.0. to ensure transparency, comparability, and consistency in the company´s reporting according to the latest standards. ABS as an independent third-party verifier was mandated to recalculate MPCC´s and IMO´s Well-to-Wake GHG Emissions Intensity baseline of 2008 as well as MPCC´s 2023 Well-to-Wake AER performance.

During the recalculation ABS determined that the regressed 2008 MPCC Fleet Well-to-Wake AER was 24.28 grams $CO_2e$ per tonne-mile.

In 2024 MPCC has adopted a revised target for fleet average GHG emission intensity, aiming for a 45% reduction by 2030. This calculation aligns with the Well-to-Wake approach and the GLEC Framework version 3.0. The updated target exceeds the International Maritime Organization's (IMO) 2030 GHG emission intensity target by an additional 5%.

### Positive Sustainability Impacts

The achieved 3.82% reduction in MPCC's fleet average well-to-wake AER from 2023 to 2024 corresponds to a direct decrease in GHG emissions per tonne-mile of cargo transported, thereby lowering the environmental footprint of the company's shipping operations. This reduction translates into significant amount of absolute GHG emissions avoided across the fleet on an annual basis. By investing in energy-efficiency retrofits, introducing modern low-emission vessels, and supporting the use of renewable fuels, MPCC is actively supporting the transition towards a more sustainable maritime sector. These measures contributing meaningfully to the achievement of international climate targets and Sustainable Development Goal 13.

### Re-assessments of KPI

As part of the 2024 progress reporting process, MPCC conducted a reassessment of the defined KPI —fleet average well-to-wake AER — to ensure its continued relevance and robustness. This review confirmed that the KPI remains closely aligned with MPCC's long-term decarbonization strategy and reflects a material, measurable, and impactful sustainability objective. The reassessment also considered regulatory developments, such as the IMO's revised GHG Strategy and evolving market expectations around climate performance. Based on this review, MPCC concluded that no adjustments to the KPI or the Sustainability Performance Target are necessary at this time, as the metric continues to be both ambitious and achievable within the existing framework.

MPC CONTAINER SHIPS

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