

## **NORWEGIAN TRANSPARENCY ACT STATEMENT**

Adopted by the Board of Directors  
on June 24, 2024

### **1. EMBED RESPONSIBLE BUSINESS CONDUCT**

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

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

MPCC's Executive Management consists of Constantin Baack (Chief Executive Officer), Moritz Fuhrmann (Co-Chief Executive Officer / Chief Financial Officer / Chief Compliance Officer), Christian Rychly (Chief Operating Officer), and Pål Sætre (Executive Vice President / General Manager Norway). And MPCC's Board of Directors consists of the five Directors Ulf Holländer (Chairman), Dr Axel Schroeder, Pia Meling, Ellen Hanetho, and Peter Frederiksen.

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

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

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

In their dealings for the Group, Business Partners must adhere to the same corporate responsibilities as MPCC. This includes but is not limited to operating their business with

integrity and respect laws, human rights, different cultures and human dignity and in accordance with fundamental human rights as enshrined in the United Nation Universal Declaration of Human Rights. And it also includes to the obligation to follow the standards of the International Labour Organization, which are guiding principles encouraged and implemented by the European Union.

A breach of this guideline may result in actions being invoked against the Business Partner, in addition to any contractual or legal remedies. Actions applied will depend on the nature and seriousness of the violation and on the degree of commitment shown by the Business Partner. The range of actions available to be imposed on the Business Partner include, but is not limited to, formal warnings that the continued non-compliance will result in more severe actions, disclosure of nature of breach to all sub-contractors, subsidiaries and associate companies, and immediate termination of contract, without recourse.

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

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

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

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

All the above-mentioned seven policies were updated since MPCC's Norwegian Transparency Act Statement 2023. Thereby, as announced in the Statement, the Business Partner Guideline now includes an explicit and more detailed undertaking of MPCC's business partners to follow the same afore-mentioned human rights principles as MPCC. Furthermore, it has been added that in the event of violations of the guideline by own actions of the Business Partner or its employees, the Business Partner is obliged to provide for and fully cooperate in remediation and compensation where required.

Our employees are required to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to practice fair dealing, honesty, and integrity in every aspect in dealing with other employees, business relations and customers, the public, the business community, shareholders, suppliers, competitors and government authorities. We respect different cultures and human dignity and operate our business with integrity and in accordance with fundamental human rights as enshrined in

the United Nations Universal Declaration of Human Rights and follow the standards of the International Labour Organization, which are guiding principles encouraged and implemented by the European Union.

All persons shall be treated with dignity and respect and unlawful discrimination against employees, shareholders, directors, customers, and suppliers on account of ethnic or national origin, race, age, gender, sexual orientation, religion or disability is forbidden. We strive to foster a diverse workforce and ensure a constructive and pleasant working environment. We have zero tolerance for harassment and discrimination in all its forms and do not tolerate behavior that can be perceived as degrading or threatening.

Our commercial considerations will never come before the safety considerations of personnel and personal incidents are unacceptable and should be always prevented. Our operations are undertaken with due regard to safety requirements and operate our business in a manner designed to protect the health and safety of our employees, seafarers, customers, public and the environment. To achieve the highest possible level of health and safety, both onshore and onboard our vessels, we consider official regulatory requirements as a bare minimum, which we aim not just to meet, but to exceed.

Our principles for ship recycling are to carry out all recycling of vessels in accordance with applicable laws and regulations – including the 2009 Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships, the Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes and their Disposal and, where applicable, EU and US EPA Ship Recycling Regulations, and to prioritize the safeguarding of the environment and human health and safety when recycling vessels.

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

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

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

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

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

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

prevent and mitigate potential human rights impacts. Our comments on this in our previous Norwegian Transparency Act Statement 2023 remain largely unchanged:

### **3.1 Crew working conditions**

3.1.1 The nature of the work performed by the crew on board our vessels makes them vulnerable to violations of their rights, particularly the potential for overtime amounting to forced labor, harassment and poor health and safety conditions. Due to the scale, scope and potential severity of any negative impact, the crew working conditions are salient human rights matters.

However, the human rights of the crew are well protected in shipping by several applicable rules and regulations which we, as well as the technical ship managers and crewing agencies involved, strictly follow. The most important rules and regulations are:

(a) The Maritime Labour Convention

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

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

(b) The International Maritime Organization's ISM Code

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

The ISM Code requires shipping companies to develop and implement a safety management system that outlines policies, procedures, and guidelines for safe ship operations, and it covers areas such as shipboard operations, emergency preparedness, maintenance of ship and equipment, crew training, and reporting of accidents and near-

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

(c) The Safety of Life at Sea Convention

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

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

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

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

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

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

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

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

3.1.2 As per the above, the protection of seafarer's human rights including their safety is well addressed in several applicable rules and regulations which from time to time are amended as necessary. For this reason, MPCC's focus is to follow these rules and regulations and to monitor the respective obedience by the technical managers and crewing agencies involved.

Accordingly, and as announced in our Norwegian Transparency Act Statement 2023, we have made a review of these parties' respective procedures, which we will repeat annually. This also includes the training of the crew on board our vessels by the parties involved to ensure adequate awareness and knowledge of the applicable ethical principles including human rights. The same applies to the review of the parties' procedures for investigation and analysis of accidents, near-miss incidents, and non-conforming processes, as these also have impact on the seafarers' human rights.

## **3.2 Ship recycling**

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

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



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

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

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

- to carry out all recycling of vessels in accordance with applicable laws and regulations – including the 2009 Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships, the Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes, and their Disposal and, where applicable, EU and US EPA Ship Recycling Regulations; and
- to prioritize the safeguarding of the environment and human health and safety when recycling vessels.

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

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

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

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

Shipowners are required to develop and maintain an Inventory of Hazardous Materials ("IHM"), which identifies, and documents hazardous materials present in a ship's structure and equipment and must develop a Ship Recycling Plan for each ship, outlining the procedures and arrangements for safe and environmentally sound recycling. The plan is submitted to the relevant authorities for approval. Furthermore, Shipowners are required to provide information about their ships, recycling plans, and the end-of-life process to the relevant authorities. Ship recycling facilities are also required to report on their recycling activities.

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

The EU Ship Recycling Regulation is closely linked to the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, which is a global framework for ship recycling. The EU regulation serves as an interim measure until the Hong Kong Convention enters into force.

(b) The Hong Kong Convention

The Hong Kong Convention, which will officially enter into force on 26 June 2025, sets out the scope and application of its provisions, which cover the design, construction, operation, and preparation for ship recycling, as well as the ship recycling process itself. It establishes standards and requirements for ship recycling facilities, aiming to ensure their safe and environmentally sound operations. It addresses aspects such as site selection, facility design, management systems, and handling of hazardous materials.

Like the EU Ship Recycling Regulation requires Shipowners (i) to develop a Ship Recycling Plan for each ship, outlining the procedures and arrangements for the safe and environmentally sound recycling of the ship, and the plan is to be maintained on board and made available to recycling facilities, (ii) to prepare and maintain an Inventory of Hazardous Materials which identifies and documents hazardous materials on board the ship and assists in proper management and disposal during recycling.

Ships are required to have a Ready for Recycling Certificate to verify compliance with the Hong Kong Convention's requirements. The convention also sets out reporting obligations for ships and recycling facilities to provide information on recycling activities.

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

The Basel Convention, which entered into force on 5 May 1992, (i) defines hazardous wastes and sets out their scope, and applies to hazardous wastes generated within a country's borders as well as those intended for transboundary movement, and establishes a control system to regulate the transboundary movement of hazardous wastes and requires countries to ensure that such movements are minimized, managed, and disposed of in an environmentally sound manner, (ii) requires participating countries to develop national legislation and regulatory frameworks to implement its provisions effectively, and promotes international cooperation, technical assistance, and capacity building to help countries in waste management and disposal, (iii) emphasizes the environmentally sound management of hazardous wastes, including their minimization, treatment, storage, and disposal, (iv) encourages countries to adopt best practices, technologies, and standards to prevent pollution and protect human health and the environment, (v) introduces a Prior Informed Consent procedure, which mandates that the exporting country must obtain the consent of the importing country before any hazardous waste shipment takes place, while the importing country can refuse consent if it determines that the waste is not adequately managed or disposed of in an environmentally sound manner, and (vi) adopted an amendment known as the Ban Amendment which prohibits the export of hazardous wastes from developed countries to developing countries for any reason, including for recycling or recovery.



3.2.3 MPCC is committed to complying with all these rules and regulations, and in so doing, to achieving the highest possible standard in ship recycling. Notwithstanding the foregoing, we will keep on monitoring developments of in applicable laws and regulations and other relevant factors also in future and will adjust our Ship Recycling Policy accordingly where necessary or appropriate, to ensure that the highest level of human rights protection is maintained. Our last version of the Ship Recycling Policy is dated 26 February 2024 and can be found at MPCC's website.

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

MPCC promotes gender equality and on board and at shore and has implemented rules regarding zero tolerance for harassment and discrimination and minority rights in its Human Capital and Human Rights Policy. However, we are aware of the fact, that crewing is a largely male-dominated profession and that due to a lack of availability of a sufficient amount of qualified crew members of a different gender, it is still difficult to employ a gender-balanced crew. Accordingly, it would not be reasonable to implement strict quotas that currently could not be met, but, as announced in our Norwegian Transparency Act Statement 2023, we have implemented in our Human Capital Policy that the employment of people of non-male gender, who are equally qualified for the relevant position, is to be encouraged, and will act and have instructed the crew managers accordingly.

### **3.4 Supply chain management**

3.4.1 For the operation and maintenance of our currently over 50 vessels hundreds of international suppliers and service companies are involved. In such an international supply chain, several human rights risks can arise, such as for example forced labor and trafficking, Child labor, discrimination, inadequate health and safety standards, restrictions on the rights of workers to form trade unions and to engage in collective bargaining, and lack of access to effective remedies for individuals and communities affected by human rights abuse.

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

3.4.3 To address this, MPCC's Business Partner Guideline, which MPCC's business partners are expected to adhere to, requires them to operate their business in accordance with fundamental human rights as enshrined in the United Nations Universal Declaration of Human Rights, to follow the standards of the International Labour Organisation, which are guiding principles encouraged and implemented by the European Union, and to prohibit unlawful discrimination on the account of ethnic or national origin, age, sex or religion. In accordance with the provisions of the Business Partner Guideline, MPCC has the right to audit Business Partners' compliance with the requirements set forth in this guideline including their observance of human rights. For this purpose, Business Partners shall allow MPCC or its representatives full access to its facilities, worker records and workers for confidential business partner audits. However, given the large number of suppliers and their international locations, this is realistically possible only in individual cases. However, MPCC will exercise this right in events where it has reasonable and concrete reason to

believe that the supplier or service provider in question has violated human rights or failed to provide decent working conditions. And if it is found that there is or has been a human rights violation or that there are or have been indecent working conditions, MPCC will exercise its rights under the Business Partner Guideline, which may result in the immediate termination of the relevant contract.

3.4.4 MPCC's Business Partner Guideline is regularly reviewed and updated. Our last update was made on 26 February 2024 where we added further details to the wording in respect of the human rights. Furthermore, we have reviewed the procedures of the technical managers involved in respect of the implementation of the Business Partner Guideline in all supply and service contracts for MPCC's vessels.

### **3.5 Search and rescue**

3.5.1 Search and rescue ("SAR") operations in shipping can occur in any waterway or region where maritime accidents, distress incidents, or emergencies occur. Accordingly, and though the specific areas of high SAR activity may change over time due to evolving patterns of maritime traffic, migration routes, and other factors, MPCC owned vessels, which operate globally, may be involved in SAR operations of vulnerable people.

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

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

Furthermore, rescued individuals have the right to privacy and the protection of their personal information, and to freedom of movement, including the right to disembarkation at a place of safety. And if rescued individuals include children, their rights must be upheld and protected in accordance with international standards, including the Convention on the Rights of the Child. This includes providing special care, protection, and access to education and appropriate legal procedures.

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

3.5.4 Our risk assessment to identify potential negative impacts on fundamental human rights in the context of SAR operations had confirmed that there were appropriate policies

in place for procedures when people are in distress, but no procedures for the period when rescued people were onboard. Meanwhile the SAR policies of all the technical managers of our vessels cover both periods and these policies are regularly monitored and amended as necessary. For this reason, and as all necessary procedures are in place, MPCC will no longer consider SAR operations as part of its salient human rights issues in the future.

3.5.5 Since the publication of our Norwegian Transparency Act Statement 2023, our vessels "AS ANITA", "AS PALINA", "AS ROSALIA", "AS FATIMA" and "STADT DRESDEN" have been involved in SAR operations, either as part of refugee rescue operations in the Mediterranean or to search a specific area for potential persons in need of rescue. The only vessel that took people on board was the MV "AS PALINA". These nine people, who later claimed to be from Cuba, were spotted on a floating raft about 61 miles off the coast of Mexico and taken on board. They were given accommodation, food and water before being safely disembarked in Veracruz and processed by the immigration authorities.

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

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

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

3.6.3 To protect the crew on board of MPCC vessels MPCC follows the "Best Management Practices to Deter Piracy and Enhance Maritime Security in the Red Sea, Gulf of Aden, Indian Ocean and Arabian Sea" ("BMP"), which has gone through several iterations. The most recent version available is BMP5 which was released on 28 June 2018. It is not a legally binding document, but a set of industry best practices developed by the shipping community aiming to assist ships in mitigating the risk of piracy attacks and ensuring the safety of crew and vessels transiting through high-risk areas. It includes recommendations for vessel hardening measures, such as installing physical barriers and enhancing lighting, as well as ensuring the crew is trained and prepared to respond to potential piracy incidents. It recommends maintaining effective communication, conducting regular piracy drills and exercises, and utilizing onboard security measures and gives advice on responding to a piracy incident, including distress signaling, activating the vessel's Emergency Contingency Plan, and reporting incidents to the appropriate authorities. Furthermore, BMP5 provides guidance on post-incident procedures, such as medical support for crew members, debriefing, collecting evidence, and reporting the incident to the appropriate organizations.

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

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

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

3.6.4 The above security measures are usually initiated by the technical managers of our vessels, and as announced in our Norwegian Transparency Act Statement 2023, we have established an annually review of the technical managers' respective procedures.

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

We have implemented all of the measures which we had announced in our Transparency Act Statement 2023 and, to the extent possible, tracked the respective results:

### **4.1 Business Partner Guideline**

We have updated our Business Partner Guideline on 26 February 2024, adding further detail to the human rights language and adding to the range of actions that can be imposed on the Business Partner in the event of a breach of the Business Partner Policy, the Business Partner's obligation to provide or cooperate in remediation and compensation where appropriate.

In addition, we reviewed the procedures of the technical managers involved in the implementation of the Business Partner Policy in all supply and service contracts for MPCC's vessels.

The satisfactory result of this review was that, prior to approval, business partners must either agree to the technical managers' specific purchasing requirements and their terms and conditions, which reflect the meaning of MPCC's Business Partner Guideline. Or compliance with MPCC's Business Partner Guideline is included in General Terms and

Conditions of Purchase, which are referenced in all purchase orders and/or new suppliers are required to confirm their acceptance and compliance with the MPCC Business Partner Guideline during the onboarding process. If business partners do not agree to comply, they cannot be onboarded as a supplier. Furthermore, certain supply and/or service contracts specifically include the business partner's obligation to comply with MPCC's Business Partner Guideline.

## **4.2 Crew working conditions**

We also have conducted a review of the procedures of the technical managers and the crewing agencies involved, to protect the seafarer's' human rights as per the applicable rules and regulations. This review is planned to be repeated annually.

4.2.1 The technical managers and crewing agencies confirmed to comply with "The Maritime Labour Convention", the International Maritime Organization's ISM Code, "The Safety of Life at Sea Convention", and "The International Convention on Standards of Training, Certification, and Watchkeeping for Seafarers". During our review we gained insight into their respective relevant procedures, including but not limited to the responsibilities of "Designated Persons Ashore", the relevant responsibilities of the masters of the vessels, internal and external audits ashore and on board, and the protection of seafarers' human rights as part of an approved Company Shipboard Safety Management Manual and office-related processes included in a Global Integrated Management System ("GIMS").

4.2.2 In addition, we have examined the parties' procedures for the investigation and analysis of accidents, near misses and non-conforming processes. These procedures, which are dependent on the relevant technical manager, include but are not limited to the implementation of an appropriate integrated management system and ensuring that it is being maintained through monitoring and follow-up of reports, such as (i) non-conformity and observation notes, near miss- and accident reports and incident reporting, feedback and other information that may affect safety and pollution prevention, (ii) evaluation of root causes to implement corrective actions with the relevant person(s) (e.g the vessel manager, the HSEQ manager, etc.) and to prevent recurrence, (iii) a risk assessment for health, safety, and accident prevention carried out on board the vessel using a matrix system for routine and non-routine tasks, with tasks requiring a higher level of risk assessment being included in a permit-to-work system, (iv) a formal corrective/preventive action system to identify areas of non-compliance and to recommend changes to the management system that affect safety and environmental protection, (v) reporting of unsafe conditions and near misses, (vi) the implementation of appropriate levels of root-cause analysis on near misses and accidents, (vii) a maintenance program to prevent accidents due to neglect, (viii) noise and vibration surveys to prevent hearing damage, (ix) competency programs for seafarers handling identified cargo, ballast, engine room, and material handling equipment on board, (x) provision of material safety data sheets on board for the use by seafarers, establishing of safety procedures for work in confined spaces and work with energy sources, (xi) conducting drug and alcohol awareness training and contagious disease awareness training, and (xii) existing emergency plans and drills.

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

4.3.1 We have explicitly implemented in our latest version of our Human Capital Policy that the employment of people of non-male gender, who are equally qualified for the relevant position, is to be encouraged, and have instructed the crew managers accordingly. They

have confirmed to follow this instruction. However, lack of qualified female crew members makes this in practice rather difficult.

As a result of our aim to increase the number of non-male crew members, the number of female crew members in the pool of crew members has increased from six at the end of the years 2022 and 2023 to fifteen as per the time of publishing this Statement. We are aware that, considering the number of vessels in our fleet and the corresponding amount of crew members, the number of non-male crew members is still very low and unsatisfying. But shipping is still a male dominated business and unfortunately the number of qualified non-male crew members, which is available at the market, is still very low. Nevertheless, we will keep on trying to increase the number of qualified non-male crew members also in the future as much as reasonably possible.

4.3.2 Whilst all other matters in section 4.2 above were to our satisfaction, one of the findings of our review of the procedures of the technical managers was that not all of them have human rights policies and/or business ethics policies in place and/or provide training to crew on board our vessels. We plan to follow up with the relevant parties on the implementation of such policies and training in the future.

#### **4.4 Supply chain management**

4.4.1 A substantial part of MPCC's business is the global marine transportation of containerized goods and the respective international operation of its vessels including their supply and maintenance. Throughout this supply chain MPCC does not tolerate any human rights violations or indecent working conditions, neither internally nor from suppliers or service providers.

To address this, MPCC's Business Partner Guideline requires business partners to operate their business in accordance with fundamental human rights as enshrined in the United Nations Universal Declaration of Human Rights, to follow the standards of the International Labour Organisation, which are guiding principles encouraged and implemented by the European Union, and to prohibit unlawful discrimination on the account of ethnic or national origin, age, sex or religion. Accordingly, by accepting our Business Partner Guideline, business partners undertake to observe high standards of business and personal ethics and human rights.

4.4.2 Violations of these undertakings, which are described in the Business Partner Guideline in detail, may result in actions being invoked against the business partner, which include formal warnings and immediate termination of the relevant contract without recourse. Regardless of this undertaking, we are aware that nevertheless such violations are not completely excluded. Therefore, as pointed out in our previous Norwegian Transparency Act Statement 2023, according to our Business Partner Guideline business partners are obliged to allow MPCC and its representatives full access to their facilities, worker records for confidential audits.

However, given the large number of our suppliers and service providers and their international locations, this is realistically possible only in individual cases. And in light of the great number of international business partners it is not feasible for MPCC to provide information and receive feedback from all affected individuals and groups throughout MPCC's international supply chain.



For this reason, MPCC will exercise its right to audit business partners in events only where it has reasonable and concrete reason or an indication to believe that the supplier or service provider in question has violated human rights or failed to provide decent working conditions. And in fact, until now, we have not had reason to believe that any of our business partners does so.

4.4.3 We have explicitly asked our technical managers if they have any indications of such violations by any business partner which all of them have neglected. In line with this, we have not received any complaint or information through our whistleblower hotline or otherwise that any of our business partners has violated human rights or failed to provide decent working conditions.

4.4.4 However, to further assess the respective risk on a sample basis, we have also asked each of our technical managers to provide the names and locations of our five business partners with the highest turnover over the past 12 months. With only one exception all were located in places that are not generally reported as places of human right abuses, i.e. Germany, the Netherlands, Denmark, Cyprus and France. In these locations the likelihood of human right abuses and unsuitable working conditions appears to be rather remote.

The only exception reported by the ship manager was a Chinese shipyard, and reports of human rights abuses in China are of course well known to us. But this obviously does not mean that each single Chinese shipyard, and in particular our respective business partner, is guilty of such abuses. The shipyards we involve, wherever they are located, are all reputable and are frequently contracted by international shipowners for repair, maintenance and other works. Thus, we do not think that, without concrete evidence or indication, it can be assumed that they are violating human rights and breaching contractual obligations in this regard.

4.4.5 Notwithstanding these considerations, in order to continue to take appropriate measures to avoid dealing with business partners who violate human rights, we plan to implement a procedure whereby our representatives at the shipyards supervising the relevant work will be required to report and document any observations of human rights violations and any suspicions of such violations. In such a case, we would contact the shipyard in question to verify or, if necessary, eliminate the suspicion. If the allegation is substantiated, MPCC would terminate its business relationship with the shipyard in question.

4.4.6 In addition, as a next step on the basis of a risk-based approach we plan to randomly ask some of our key suppliers and service providers who, due to their location and/or other relevant considerations, appear to be at particular risk of human rights abuses or not to provide decent working conditions, to let us have meaningful information and/or documentation that they in fact do respect human rights and provide decent working conditions. Alternatively, where reasonably available, we will consider obtaining a feedback from a worker's representative (for example a trade union or an NGO).

## **4.5 Security response to piracy**

4.5.1 Since the previous Norwegian Transparency Statement 2023 was published, we have made a review of the technical managers' security measures against piracy. Such review will be repeated annually in future. The result was that all technical managers have appropriate measures in place, which include but are not limited to the implementation of

measures as per BMP 5 (e.g. razor wire, waterspray, sandbags, dummies, etc.) and placing armed guards on board where necessary.

In addition, the situation is permanently monitored and assessed and most vessels are rolled out to a close voyage monitoring scheme by an external security provider including but not limited to live monitoring of the vessels and ad-hoc route advisory in case of potential threats to the vessel and or crew. Furthermore, the ISPS procedures are followed and all measures are conducted in compliance with the flag state approved ship security plans.

4.5.2 When considering sailing of MPCC vessels in the Red Sea area respective threats by Houthi rebels and the actual situation are evaluated by an exchange with e.g. a risk intelligence provider, the members of the Container Ship Safety Forum, the German Navy Command, with French Maritime Information Cooperation and Awareness (MICA) Center, Operation Aspides to evaluate the actual situation and the risk to sail in this area. Relevant measures taken, e.g. for our vessel AS Alexandria were the support of armed guards and a special risk intelligence service, including but not limited (i) to routing advice, including any advised waypoint, (ii) security advice, including transit risk assessment, (iii) BMP checklist, (iv) vessel tracking, (v) over the horizon analyst scanning, (vi) incident alerts, (vii) re-routing assistance, (viii) crisis management reach-back in the event of an incident, and (ix) conducting only night-time transits under full speed through the most critical legs of the HRA passage.

#### **4.6 Results of our measures**

In order to evaluate the results, the starting point is our previous statement on the Norwegian Transparency Act 2023. Already back then, we did not have any cases of violations reported through our whistleblowing hotline and we were not aware of any cases of human rights violations or poor working conditions by any of our business partners, or of any violations of our Business Partner Policy. We had not recycled ships, and we were not aware of any inadequate procedures relating to piracy or SAR operations.

Thus, the situation at the starting point was already very satisfactory and it we are happy that these positive facts have not changed since then. However, regardless of this very good result to further improve their quality we will continue to update and develop our relevant procedures and policies where necessary or reasonable

The only aspect addressed in the previous statement that can be clearly measured is the number of non-male crew members on board our vessels. As noted in Section 4.3.1 above, this number has increased from 6 to 15, which is at least a small step in the right direction.

#### **4.7 Further planned future measures**

In addition to the measures as per Sections 4.3.1, 4.3.2, 4.4.5, and 4.4.6 above, and to ensure that the highest level of human rights protection is maintained also in future, we plan (i) to monitor developments of applicable laws and regulations and own experiences to amend and/or extent our policies and guidelines where necessary or reasonable, (ii) to audit suppliers and service providers where we have reasonable and concrete reason to believe that they have violated human rights or failed to provide decent working conditions, (iii) if it is found that there is or has been a human rights violation or that there are or have been indecent working conditions, to exercise our rights under the Business Partner

Guideline, which may result in the immediate termination of the relevant contract, and (iv) to constantly review our due diligence procedures for potential improvements and updates.

#### **4.8 Tracking the results of the measures as per this Statement**

We will track the results of the planned measures as per this Statement and publish them in our Norwegian Transparency Act Statement 2025.

### **5. GRIEVANCE MECHANISMS AND REMEDIATION**

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

Neither in the year 2022 nor in 2023 or 2024 up to the date of this statement there were any reported cases relating to Human Rights.

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

If you would like more information about MPC Container Ship ASA's work with the Norwegian Transparency Act, please contact Mr. Pål Sætre via e-mail to [p.satre@mpc-container.com](mailto:p.satre@mpc-container.com) or by phone at +47 90 78 76 94.