ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. THE SCOPE OF POLICY

This Anti-Bribery and Anti-Corruption Policy (the "Policy") applies to all directors, officers, contractors, and employees of (1) Danaos Corporation and its subsidiaries and other business entities controlled by it (collectively, the "Company"); (2) affiliates and entities that regularly provide management or other services to the Company, including Danaos Shipping Company Limited (the "Managers") and Danaos Chartering Services Inc., and (3) Third Parties performing duties for or acting on behalf of the Company (all such persons, "Covered Persons"). Any reference to "Company", "we" and/or "us" in this Policy applies jointly to Danaos Corporation, Danaos Shipping Company Limited and Danaos Chartering Services Inc. The term "Third Party" includes but is not limited to agents, brokers, vendors, partners, managers, consultants, contractors, joint venture partners, and other representatives, whether individuals or organizations, and wherever they are located. Compliance with this Policy and with the law is an ongoing responsibility of all Covered Persons.

2. THE POLICY AND ITS PURPOSE

The Policy explains the Company's rules with respect to ethical conduct in business, in particular preventing bribery and corruption in our business dealings; and it provides guidance on how to act in a variety of situations. This Policy asks you to act with integrity in all your business dealings – i.e., to do the right thing for the right reason.

The purpose of the Policy is to formally affirm the Company's commitment to conduct its business activities worldwide in strict compliance with both the explicit requirements and principles of anti-bribery and anti-corruption legislation, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act ("UK Bribery Act"), laws implementing the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Officials in International Business Transactions ("OECD Convention"), and the anti-bribery, anti-corruption, anti-fraud, and anti-money laundering laws of countries and regions where the Company operates (collectively referred to as "Anti-Corruption Laws").

3. REQUIREMENTS

The Company prohibits bribery of any kind, either active or passive, as defined here below, including bribes to or from Government Officials and to or from non-government or private sector parties (commercial bribery). We have a zero-tolerance policy for bribery in all of our operations and activities.
This means that no Covered Person may: (1) offer, provide, promise or agree to provide, or authorize a Bribe to any person, whether that person is in the private sector or a Government Official; or (2) request, accept, or initiate a Bribe from any person; or (3) authorize or solicit anyone to do so or try to do directly or indirectly either of the above through third parties, such as brokers or agents, with the intent to obtain or retain business or a business advantage or to secure services.

A "bribe" is defined as:

- Making improper payments, or offering, promising or providing anything of value, either directly or indirectly, in order to improperly influence another person or to retain or obtain a business advantage or secure advantage for an individual, or secure government authorizations, licenses, approvals, etc., or receive favorable treatment; or

- Requesting or accepting anything of value (either directly or indirectly) as a reward for or as an inducement to act improperly in relation to the awarding of business by the Company, or for providing improper advantage or favorable treatment; or

- Offering, providing, promising to provide, or authorizing unjustified benefits or payments: Offering any form of undue reward, not limited to money, including extravagant trips, entertainment or gifts of significant value, job offers, etc.; and

- Using intermediaries: Using another party to provide, promise or agree to provide, offer, solicit, or accept bribes on behalf of any Covered Person

"Anything of value" is defined broadly and includes, but is not limited to: money or cash equivalents, such as gift cards; gifts; contracts or business opportunities; stock; political or charitable donations; medical or educational expenses; job opportunities; discounts on products and services not readily available to the public; business deals for friends or family; loans or forgiveness of debt; and travel, meals, or entertainment expenses.

A "business advantage" is anything that helps our business. It can be, for example, a contract, sale, agreement, or charter party. It also can be the acquisition of a permit or license needed to conduct business or, for example, to permit a voyage.

There is no exception for small amounts. Even the provision or acceptance of items of small value can violate this Policy and the applicable Anti-Corruption Laws. Similarly, it does not matter whether the bribe is actually provided or accepted; the mere offer, promise, agreement, or authorization of a bribe is enough to violate this Policy and Anti-Corruption Laws.

In the event of any conflict, or inconsistency, between this Policy and other Company policies, procedures or manuals, this Policy shall prevail.

4. SPECIAL REQUIREMENTS WHEN DEALING WITH GOVERNMENT OFFICIALS

The definition of a "Government Official" is very broad and includes:

- Any elected or appointed official, officer or employee of any government (local, regional, national or foreign) or any agency, department or instrumentality of a government.
- Any official or employee of a state-owned or controlled company, entity, or enterprise.
    - **Note**: This includes, but is not limited to, state-owned or controlled public utilities and/or natural resources companies (e.g., oil, gas, electricity, etc.). Accordingly, any officer or employee of such entity qualifies as a Government Official.
- Any officer or employee of a public international organization (e.g., the World Bank, the United Nations, or the International Monetary Fund).
- Any owner, director, officer, or employee of any organization that performs a government function.
- Any political party or any official thereof.
- Any candidate for public office or political party, civil servant, or military personnel.
- Any person acting in an official capacity on behalf of a government or any agency, department, or instrumentality of a government, or of any of the individuals or entities referenced above.
- A family member or close associate of a Government Official

If any Covered Person interacts with a Government Official while providing services to, or acting on behalf of the Company, increased caution is required. This applies, for example, when the Company engages an agent or broker who, in turn, provides services to and/or interacts with a Government Official, including an employee of a state-owned or controlled entities (e.g., an agent that provides broker services to a state-owned utilities company).

In accordance with this Policy, Covered Persons are strictly prohibited from offering, providing, promising or agreeing to provide anything of value to influence the actions or decisions of, or to obtain any improper advantage with, or to confer any illegal or improper benefit upon, a Government Official in any country. This prohibition applies regardless of whether the objective is to obtain, retain or direct business or to influence government bodies through such officials.

5. EXPEDITING OR FACILITATING PAYMENTS

The Company does not permit expediting payments. Expediting payments (also known as "facilitating" or "grease" payments) are payments made to speed up or secure the performance of a routine government action, such as customs clearance, port discharge payments, or the granting of permits. This could include but is not limited to the following routine actions: (i) processing licenses, permits or other official documents; (ii) processing government paperwork, such as visas and work orders; (iii) providing services, such as police protection and mail pick-up and delivery; (iv) scheduling inspections associated with contract performance or inspections related to transit of goods across country; or (v) providing phone service, power and water supply, loading or unloading of cargo, or protecting perishable products or commodities from deterioration.

Expediting payments are considered illegal bribes in many jurisdictions. Therefore, Covered Persons must not make, authorize or offer expediting payments in connection with any services performed for the Company, no matter where the business is conducted. This prohibition applies regardless of local customs or practices. Although it may be customary for Government Officials in some countries to request these expediting payments, this does not render them legal or legitimate. Legitimate, officially established fees paid to a government authority for expedited services are not facilitating payments where properly authorized and accurately recorded.

6. THIRD PARTIES

As defined above, the term "Third Parties" includes any individual or entity that performs duties for, provides services to, and/or acts on behalf of the Company, including but not limited to agents, brokers, vendors, partners, managers, consultants, contractors, joint venture partners, and other representatives.

In many instances, the Company engages Third Parties that provide services to, or perform duties for, or otherwise act on behalf of the Company. Third Parties are not allowed to engage in any conduct on behalf of the Company, that the Company itself is prohibited from performing. The actions and activities of these Third Parties may be attributed to the Company, and the Company may be held liable for any violations, including breach of Anti-Corruption Laws. As such, great care must be taken in the selection and retention of brokers, agents, consultants, and representatives.

The Company shall apply risk-based due diligence to Third Parties before engagement, proportionate to their role, the nature of the services, and the corruption risks involved. Once engaged, Third Parties shall be subject to monitoring proportionate to the risks presented, including identified red flags, to support compliance with this Policy and applicable Anti-Corruption Laws.

7. RED FLAGS

Covered Persons must be aware of "red flags" that may indicate corruption, including but not limited to, the following:

- History or reputation of corruption or unethical conduct in the country where you are doing business.
- Unusual payment arrangements, including pressure to make a payment ahead of schedule; requests for or offers of cash or cash equivalents; requests to pay by unusual methods, such as with travelers checks or lavish gifts; requests that payment be made in the name of a person or entity other than the third party or to an account located in an unrelated country.
- Any request for or offer of lavish entertainment or expensive gifts, or meals, entertainment, travel or travel-related expenditures, with no apparent business purpose.

- Refusal by a Third Party to agree verbally and in writing to comply with this Policy and/or Anti-Corruption Laws.
- Lack of qualifications or resources on the part of the Third Party to perform the services offered (particularly where the Third Party is the required/preferred vendor for any Government Official or entity).
- A Third Party that has qualifications including personal relationships with Government Officials.
- A Third Party that has an unsavory reputation or a criminal record or is not well known in the industry, as indicated through checking references or otherwise.
- A request for a "bonus" or "special fee" or other payment contingent upon the Third Party's successful acquisition of a license, permit, approval, or obtainment of some other discretionary act, or upon payment of a required fee, such as a customs payment or port-related charge.
- Fees or commissions that do not appear to relate to the value of the services provided or seem unusually high or excessive in relation to the services provided.
- A Third Party's use of a sub-agent or intermediary without informing the Company.
- Recommendations, or insistence, by a Government Official to hire a specific Third Party.
- Lack of transparency in expenses and accounting records.

Additional behaviors may also constitute a "red flag" and Covered Persons should always remain vigilant to any conduct or behavior that may raise questions or concerns. If there is uncertainty about actions that might constitute a "red flag," please contact the Chief Operating Officer, or the Compliance Officer. It is always wise to err on the side of caution.

8. GIFTS, ENTERTAINMENT, AND TRAVEL EXPENSES

Covered Persons must be cautious when giving gifts or entertainment to, or accepting gifts or entertainment from, anyone who does or seeks to conduct business with a Covered Person. Giving or accepting gifts and entertainment may appear to influence the recipient's ability to make objective business decisions.

Covered Persons may provide and accept meals, entertainment, token gifts, or favors to or from any non-Government Official, which: (i) have a valid business purpose; (ii) do not have significant value; (iii) do not create a real or apparent sense of obligation; (iv) are customary and widely accepted in the applicable location; (v) are consistent with local laws, rules, and regulations; (vi) are permitted by the Company's or such Third Party's policies; (vii) are pre-authorized by the Company's Chief Executive Officer or Chief Operating Officer, or Chief Financial Officer; and (viii) are properly reported and timely and accurately recorded in the Company's books and records.

Covered Persons may pay for the reasonable cost of a non-Government Official's meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion or demonstration of the Company's business; or, in the case of entertainment, they are provided in order to develop business relationships or improve communications regarding the Covered Person's business with a non-government entity or agency.

In all cases, such business expenses should be avoided if they could create a feeling of obligation, or compromise a Covered Person's professional judgment or the judgment of the recipient or influence the recipient to do or not do something in favor of a Covered Person.

Covered Persons are not permitted to accept gifts and gratuities from persons who do or are seeking to do business with the Company, except token gifts that meet the conditions stated above. Ordinary business entertainment, such as meals that are reasonable and neither frequent nor lavish, is excluded from this prohibition, subject to those conditions.

Providing a *per diem* to any party, even if for purely lawful and legitimate purposes, poses an inherent risk that the payment could be misconstrued as a bribe, or otherwise create an appearance of impropriety or unethical conduct. For these reasons, such payments are strictly forbidden by this Policy.

Covered Persons may not, **under any circumstances**, offer anything of value to a Government Official with whom they are conducting or seeking to conduct business on behalf of the Company or before whom they are representing the Company.

Third Parties may not engage in any conduct on behalf of the Company that the Company itself is not permitted to engage. Thus, for example, if you are not allowed give a business gift under this Policy, you may not instruct or permit a Third Party to give the gift on your behalf.

9. LOBBYING AND POLITICAL AND CHARITABLE DONATIONS

Lobbying is the process of communicating the Company's point of view and interests regarding proposed government actions and attempting to persuade government officials to act in a manner that supports the Company's business objectives and public policy positions. Lobbying does not include routine contact with Government Officials or employees in connection with standard government processes, such as regulatory audits, applications for permits, or product sales to government agencies.

In compliance with local laws, the Company may, from time to time, lobby representatives of various governments. Many governments, including the federal and state governments in the United States, regulate the activity of lobbying. Violating these laws may result in significant civil fines or criminal charges against both the individual and the Company. Lobbying is broadly defined and highly regulated and what might be culturally acceptable and legal in one country might be illegal in another.

The use of the Company's assets for, or in support of, political parties or candidates for public office is prohibited. To ensure compliance with Anti-Corruption Laws, Covered Persons may not offer, promise, authorize, or make, directly or indirectly, a political contribution on behalf of the Company.

Charitable contributions and sponsorships, while often beneficial to the community, can pose corruption risks if used to improperly influence business decisions or secure undue advantages. Therefore, any charitable contribution or sponsorship made on behalf of the Company may be made **only with prior written authorization from** the Chief Operating Officer and the Chief Executive Officer. All approved contributions and sponsorships must be transparent, properly documented, and made to legitimate organizations.

You must consult with the Company's Chief Operating Officer or the Compliance Officer for guidance before engaging in any activity that may be considered lobbying. Charitable contributions and sponsorships are subject to the prior written authorization requirements stated above.

10. RECORD-KEEPING REQUIREMENTS AND INTERNAL CONTROLS

The Company is required to maintain accurate, fair, and complete books and records. This requirement applies to all transactions conducted by the Company. Each employee is personally responsible for the accuracy of his or her records and reports. Accurate information is essential to the Company's ability to meet its legal and regulatory obligations

As such, **all** payments, transactions, dispositions of assets, and other activities made pursuant to this Policy must be accurately recorded in the Company's corporate books and records in a timely manner and in reasonable detail, including the date, amount, payee, reason for payment, and supporting receipts. Great care must be taken to accurately record and not mischaracterize the reason(s) for and/or type(s) of payments being made to Third Parties. False, misleading, incomplete, inaccurate, or artificial entries in the Company's books and records are strictly prohibited. No undisclosed or unrecorded accounts are to be established for any purpose, and off-the-books transactions or funds ("slush funds") will not be tolerated.

All accounting records, expense reports, invoices, and other business records must be retained, reported, and recorded in accordance with applicable laws, regulations, and recognized accounting principles, and in accordance with the Company's record-management program and retention schedule. All records and supporting documentation must be periodically reviewed to identify and correct any discrepancies, errors or omissions.

All Third Parties must ensure that the data they provide to the Company for the preparation of financial statements, regulatory reports, and publicly filed documents complies with all applicable accepted accounting principles and the Third Party's internal control procedures.

The Company shall periodically audit its records to ensure that financial transactions and payments are conducted in accordance with the Company's policies.

The Company is also required to maintain a system of internal accounting controls that is designed to detect and prevent improper payments to Government Officials or others and that provides reasonable assurances that:

- Transactions are executed in accordance with the management's general or specific authorization;
- Transactions are recorded as necessary to permit preparation of financial statements in conformity with applicable accounting principles and to maintain accountability for assets;
- Access to assets is permitted only with management's authorization; and
- The recorded accountability for assets is regularly compared with the existing assets and appropriate action is taken to address any differences.

If any person has any reason to believe that internal accounting controls are being circumvented, or that any books or records related to the Company are being maintained in a fraudulent, inaccurate, or incomplete manner, or feels pressured to prepare, alter, conceal, or destroy documents, he or she shall report these concerns immediately to the Company's Chief Operating Officer, Compliance Officer, or Audit Committee at the contract information provided below.

11. TRAINING AND AWARENESS

Regular anti-bribery and anti-corruption training is provided to all employees of the Company to support their understanding of this Policy and applicable laws. Participation is mandatory and is overseen by the Compliance Officer. Training covers corruption risks, warning signs, and the procedures for reporting suspected violations, with additional guidance tailored, as appropriate, to employees' roles, responsibilities, and risk exposure.

Directors are provided with relevant information and updates on anti-bribery and anti-corruption matters, with briefings or other learning opportunities made available as appropriate to their responsibilities. Third Parties acting on behalf of the Company are provided with training or targeted communications appropriate to their role, responsibilities, and associated risk exposure.

12. ENFORCEMENT AND PENALTIES

Bribery and other corrupt practices may expose the Company and its officers, directors, contractors, and employees to criminal prosecution, jail time, criminal fines, and significant civil penalties. In addition, such conduct may severely damage the reputation and/or seriously disrupt the business operations of the Company and of all Covered Persons.

Therefore, the Company views any actual or attempted act of corruption or bribery, or any act in contravention of this Policy, very seriously. Any credible allegations regarding a breach of this Policy or any Anti-Corruption Law will be investigated. Covered Persons have a duty to fully cooperate with an investigation and must provide all known information and must not withhold, destroy, or tamper with any records or other potential evidence related to the matter under investigation.

Failure to comply with this Policy or any attempt to mislead or obstruct an investigation may result in disciplinary action, up to and including immediate termination of employment or termination of a Third Party's relationship with the Company. Where a case is referred to a law enforcement agency, the Company will, and Covered Persons are expected to, cooperate with the agency's investigation.

In accordance with the Company's Ethics & Compliance Policy, actual, suspected, or alleged breaches identified through reports, audits, monitoring, or other sources are recorded and assessed promptly. The Compliance Officer coordinates the handling of ethics and compliance matters, with Audit Committee oversight of matters relating to accounting, internal controls, financial reporting, or auditing.

Where appropriate, allegations are investigated fairly, impartially, and proportionately, with due regard to confidentiality, potential conflicts of interest, and preservation of relevant evidence. The Compliance Officer coordinates investigations with relevant departments, and Internal Audit may assist with independent reviews. Significant matters are escalated under the Company's established governance arrangements; allegations involving senior management or Audit Committee members are referred to the Board.

Findings and resulting decisions are documented, and appropriate corrective or disciplinary actions are taken where warranted. The Chief Operating Officer ensures implementation of corrective or disciplinary measures where required, subject to appropriate independent oversight when conflicts of interest arise. Remedial actions are monitored to completion, as appropriate, and lessons learned are considered when improving controls, procedures, and training.

13. REPORTING AND NON-RETALIATION

Covered Persons shall report in a timely fashion any conduct which is believed in good faith to be a violation or potential violation of any Anti-Corruption Law, anti-money laundering law, or this Policy. Covered Persons may report in any of the following ways:

- Contact the line manager.
- Send an anonymous report to the Audit Committee via the Whistleblowing Report Form.
- Call the Chief Operating Officer at +302104196426, or the Compliance Officer at +302104196483.
- Email the Chief Operating Officer at coo@danaos.com, or the Compliance Officer at compliance@danaos.com.
- Send a letter to the Chief Operating Officer, or the Compliance Officer at 14 Akti Kondyli, Piraeus, 18545, Greece.

By reporting misconduct, you are contributing to the Company's ethical culture and upholding the Company's values. All such reports shall be treated confidentially to the extent permitted by law.

Covered Persons have a duty to cooperate with any investigation into known or suspected violations of this Policy or the law.

The Company prohibits retaliation in any form against any person for making a good faith report under this Policy or for cooperating with an investigation into an alleged violation of this Policy or the law – even if the report is not substantiated. Anyone found to have retaliated against someone for making such a report will be subject to corrective action, up to and including termination of employment.

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If you have any questions or concerns about this Policy or applicable law, contact the Chief Operating Officer, or the Compliance Officer.

This Anti-Bribery and Anti-Corruption Policy was adopted by the Board in October 2020; last revised in November 2026.