RESPONSIBLE ARTIFICIAL INTELLIGENCE (AI) POLICY

PURPOSE AND SCOPE

Danaos Corporation, together with Danaos Shipping Co. Ltd. (the "Manager"), Danaos Chartering Services Inc. and their wholly owned subsidiaries (collectively, "Danaos" or the "Company"), recognize the opportunities that Artificial Intelligence (AI) can provide in supporting operational performance, safety, environmental performance, reporting, risk management and the development of our people. We also recognize that AI must be used responsibly and with appropriate safeguards.

This Policy applies to all forms of AI tools and systems used within the Company or in our products and services, including but not limited to Large Language Models ("LLMs"), third-party AI tools, and plugins.

Our approach is based on the following principles and commitments.

1. RESPONSIBLE AND HUMAN-CENTERED USE

Danaos supports the use of AI to assist human work and judgment. The Company prohibits utilization of AI tools in a fully-automated manner (e.g., without human oversight or intervention). For critical decisions influenced by AI, Danaos applies human-in-the-loop (HITL) oversight: an appropriate person remains involved in reviewing and approving the outcome and can question, intervene or override where necessary.

2. ACCOUNTABILITY

The use of AI does not remove human or organizational accountability. Danaos maintains defined responsibilities for significant AI uses, including ownership of the use, review of outputs, risk and compliance decisions, and the final action or decision. Material AI-related errors, incidents or harmful outcomes are investigated, corrected and escalated through the appropriate Company processes, with responsibility remaining with the relevant individuals and functions under applicable law and Company requirements.

3. PRIVACY AND DATA PROTECTION

We are committed to respecting privacy and protecting personal data and confidential information when AI is used. Personal data used in AI must be processed for specified, explicit and legitimate purposes, on an appropriate lawful basis and comply with applicable data protection laws and requirements. Use of AI must also comply with Danaos' requirements and respective policies governing the appropriate use and protection of information.

4. CYBERSECURITY

AI is used within the Company's cybersecurity and information security framework. Danaos applies risk-based measures to protect users and the information they enter when using AI systems and related infrastructure against unauthorized access, misuse, information leakage, manipulation and other relevant security risks. Depending on the system and Danaos's role, these measures may include access controls, encryption, security assessment and testing, monitoring, incident response and secure development practices where AI is developed or materially customized by Danaos.

5. FAIRNESS

Danaos does not permit AI use that results in unlawful discrimination or unfair treatment. Where AI may materially affect individuals, appropriate human oversight and proportionate measures are required to identify, assess and mitigate potential bias in relevant data, inputs and outputs. Where Danaos develops or materially customizes AI, data used for development or testing should be appropriate and, where relevant, sufficiently representative.

6. TRANSPARENCY AND EXPLAINABILITY

Where AI materially influences a significant decision or outcome, there should be an appropriate understanding of the role of AI, including its relevant capabilities, limitations, potential risks and, where available and relevant, the data or information used, as well as the basis on which its output is used. Danaos will provide appropriate disclosure regarding AI use where required by law or appropriate to the nature and significance of the use. Where individuals interact directly with an AI system, they will be informed that they are interacting with AI where required by applicable law or where this is not otherwise obvious.

7. CLEAR BOUNDARIES

Danaos establishes boundaries around acceptable and unacceptable use of AI through its internal policies, approved tools and governance processes. AI must not operate outside its authorized purpose or bypass required Company controls. Danaos does not permit AI use involving prohibited manipulation or exploitation of vulnerable persons, social scoring, or unauthorized biometric surveillance or identification.

8. ENVIRONMENTAL RESPONSIBILITY

Danaos recognizes that AI models and the data center infrastructure supporting them can have an environmental footprint. For material AI services, Danaos expects relevant providers to demonstrate appropriate attention to energy, water and carbon efficiency and will take these considerations into account, where relevant and proportionate, in the selection and review of AI services.

9. RESPONSIBLE USE BY OUR PEOPLE

Danaos maintains internal rules that enable responsible use of AI, including protection of Company information, human review, approval of AI tools and escalation of sensitive uses. Danaos also supports appropriate AI literacy through guidance and training in line with each role.

10. BUSINESS PARTNERS

Where third parties provide AI systems or AI-enabled services to Danaos, or use AI in providing services on our behalf, we expect compliance with applicable law and with relevant Danaos contractual, confidentiality, data protection and cybersecurity requirements.

11. BUSINESS PARTNERS REGULATORY COMPLIANCE

Personnel are responsible for using AI in compliance with applicable law and regulations. All AI tools must undergo a security and compliance review before deployment. Any use of AI must not be misrepresented. Any high-risk AI usage, or AI usage that results in legal or similarly significant effects, requires additional oversight and approval from Danaos legal department.

12. GOVERNANCE AND CONTINUOUS IMPROVEMENT

Danaos reviews its approach to responsible AI as technology, its use within the Company and applicable requirements evolve.

This Responsible Artificial Intelligence Policy was adopted by the Board in November 2026.