

# ANTI-MONEY LAUNDERING POLICY

## 1. POLICY

It is the policy of Danaos Corporation and its subsidiaries and other business entities controlled by it (collectively, the “Company”), as well as all affiliates and entities that regularly provide management services to the Company, such as Danaos Shipping Company Limited (the “Managers”) (together with the Company, the “Covered Entities”), to comply fully with all applicable anti-money laundering laws and regulations and to actively take steps to prevent any activity that directly or indirectly facilitates money laundering and/or the funding of illegal or terrorism-related activity. Applicable anti-money laundering laws and regulations include not only those of the countries in which a Covered Entity is domiciled but also those of the countries in which a Covered Entity conducts business.

## 2. SCOPE

This Policy applies to all directors, officers, contractors, and employees of all Covered Entities and of “Third Parties” that perform duties or provide services for, or act on behalf of, the Company or the Managers (each such person, a “Covered Person”).

Compliance with anti-money laundering policies and procedures is an ongoing responsibility of each Covered Person.

## 3. REQUIREMENTS

No Covered Person shall engage in or authorize, approve, or condone any activity by any Covered Entity that violates any applicable anti-money laundering laws and regulations or that directly or indirectly facilitates money laundering and/or the funding of terrorism or criminal activity.

Money laundering is the act of disguising illegally derived funds as legitimate payments and receipts. Money laundering can occur by means of overpayments, underpayments or payments for goods or services that are not provided. Accordingly, Covered Persons should closely monitor payments, receipts, and other financial transactions relating to the Covered Entities for any suspicious activity.

Such suspicious activities may include, but are not limited to:

- An invoice or payment that lacks a business purpose or is inconsistent with the Covered Entity’s business activities or the amount of goods or services that have been provided;
- A receipt or payment that is larger in amount than the amount that is actually due or payable;
- A payer or payee that refuses or is unable to explain the difference in the amount that was received or paid versus the amount that was due or payable;
- A payer or a payee that refuses to reveal information concerning its business activities; or
- Information provided by a payer or payee that appears false, misleading, or incomplete.

Any Covered Person who has knowledge or reason to suspect or believe that a violation of any anti-money laundering laws has occurred or is about to occur shall report such information in a timely fashion to the Chief Operating Officer [coo@danaos.com / +302104196426], or to the Compliance Officer [compliance@danaos.com] / +302104196483]. Alternatively, such information may be submitted via the Whistleblowing link - that is available on the web site of the Company – and be received anonymously by the Audit Committee.

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 any anti-money laundering 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, contact the Chief Operating Officer, or the Compliance Officer.

*This Anti-Money Laundering Policy was adopted by the Board on October 30, 2020.*