

# ETHICS & COMPLIANCE POLICY

## 1. 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"), is committed to conducting business with honesty, integrity, and transparency in full compliance with applicable laws, regulations, and internationally recognized standards of responsible corporate conduct as well as with the applicable sanction rules imposed by the UN Security Council, European Union, U.S.A, the U.S. Office of Foreign Assets Control (OFAC), the United Kingdom and other relevant jurisdictions. 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.

This Ethics & Compliance Policy (the "Policy") establishes the framework for reporting, assessing, and resolving actual or suspected violations of laws, regulations, international trade sanctions or Company policies, ensuring that all concerns are handled promptly, fairly, and confidentially.

This Policy applies to all directors, officers, employees, contractors, agents, consultants, and Third Parties performing duties for or acting on behalf of the Company (collectively, the "Covered Persons").

It complements and should be read in conjunction with:

- Code of Business Conduct & Ethics
- Anti-Bribery and Anti-Corruption Policy
- Anti-Money Laundering Policy
- Anti-Fraud Policy
- Insider Trading Policy
- Supplier Code of Conduct
- Human Rights Policy
- Data Protection Policy

Together, these documents form an integrated governance and compliance framework.

## 2. ETHICAL CONDUCT AND COMPLIANCE OBLIGATIONS

Covered Persons must conduct themselves with honesty, fairness and professionalism at all times and must comply with all applicable laws and regulations, internal policies, codes and procedures, and uphold the principles of accountability, respect, and sustainability.

Covered persons are expected to avoid any dealings with sanctioned individuals, entities, or countries, and to report any potential sanctions-related concerns immediately through the appropriate channels.

Any violation of this Policy or the related policies listed hereabove, whether deliberate or negligent, will not be tolerated. Such violations may result in disciplinary actions, including but not limited to the termination of employment or engagement.

### 3. REPORTING CONCERNS AND COMPLAINTS

The Company encourages Covered Persons and stakeholders to promptly raise any concern or report any suspected misconduct, including but not limited to accounting or internal-control irregularities, fraud, corruption, or bribery, any breach of anti-money-laundering or competition laws, any actual or suspected sanctions violation, insider-trading or market-abuse concerns, environmental, safety, or human-rights violations, harassment, discrimination, or retaliation, and any other violation of the Code of Business Conduct and Ethics or related policies.

Covered Persons, who believe reasonably and in good faith that malpractice or any violation as described here above exists, may report it directly to the line manager, the Internal Audit Department, or a member of the Audit Committee.

Alternatively, reports may be made confidentially and/or anonymously through any of the following channels:

- Contact the line manager.
- Send an anonymous report to the Audit Committee via the [Whistleblowing Report Form](#).
- Call the Compliance Officer at +302104196483.
- Email the Compliance Officer at [compliance@danaos.com](mailto:compliance@danaos.com).
- Send a letter to the Compliance Officer at 14 Akti Kondyli, Piraeus, 18545, Greece.

### 4. RESPONSIBILITIES AND OVERSIGHT

The Audit Committee oversees complaints relating to accounting, internal controls, financial statements, or auditing matters. The Compliance Officer administers this Policy, manages all other ethics or compliance matters, and coordinates investigations with relevant departments. The Internal Audit Department may assist with independent reviews and ensure findings are documented and reported to the Audit Committee. The Chief Operating Officer ensures that corrective or disciplinary actions are implemented where required.

Where allegations involve senior management or members of the Audit Committee, the matter shall be referred directly to the Board of Directors of Danaos Corporation.

### 5. CONFIDENTIALITY AND DATA PROTECTION

All reports and investigations shall be treated as strictly confidential. Information will be disclosed only to individuals who have a legitimate need to know about the proper handling of the matter.

Personal data collected through this process will be processed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Policy, using lawful and proportionate means and ensuring secure retention and restricted access.

## 6. NON-RETALIATION

The Company strictly prohibits retaliation against any person who, in good faith, raises a concern, reports misconducts, participates in an investigation, or refuses to engage in unethical or unlawful conduct.

Retaliation includes demotion, harassment, intimidation, or any adverse employment or contractual consequence. Any such act constitutes a serious violation of this Policy and may result in disciplinary action, including termination.

Any report submitted maliciously or in bad faith may itself be subject to disciplinary action.

## 7. INVESTIGATION AND RESOLUTION

*Assessment:* Upon receipt of a report, the Compliance Officer or the Audit Committee shall determine whether it falls within their remit and whether an investigation should be initiated.

*Investigation:* Investigations are impartial, objective, and conducted confidentially, respecting the rights of all parties involved.

*Outcome:* Findings and corrective measures are documented, and appropriate actions are implemented. Where feasible, and consistent with confidentiality, the reporter may be informed of the outcome.

*Recordkeeping:* All case files and evidence are securely stored with restricted access and retained for at least five (5) years or longer where required by law.

## 8. TRAINING AND AWARENESS

As part of the Company's ethics and compliance framework, all employees participate in periodic, risk-based training on ethics, compliance, and the Company's core policies, including anti-bribery, anti-fraud, anti-money-laundering, insider-trading, data-protection, and human-rights principles. Such training is designed to promote awareness of legal and ethical obligations and to reinforce expected standards of conduct. Participation in training initiatives is mandatory and is overseen by the Compliance Officer.

Directors and, where appropriate, Third Parties are provided with ethics and compliance training or communications commensurate with their oversight role or the nature of their engagement with the Company.

## 9. AUDIT COMMITTEE AUTHORITY

The Audit Committee shall have the authority to engage an independent counsel or other advisers and the Company shall provide appropriate funding for such advisers and for the ordinary administrative expenses of the Audit Committee in carrying out its duties.

## 10. GOVERNANCE FRAMEWORK

This Policy operates as part of the Company's overall governance structure. Where a matter falls within a specialist policy, such as bribery, fraud, money-laundering, or insider-trading, the reporting and investigation provisions of this Policy apply in conjunction with the relevant policy's specific requirements.

Collectively, these policies ensure compliance with the Sarbanes-Oxley Act, FCPA, UK Bribery Act, EU Whistleblower Directive, and other applicable international standards.

#### **11. MONITORING AND REVIEW**

The Compliance Officer maintains a log of all complaints and monitors the implementation of corrective measures. Periodic summaries and trend analyses are provided to the Audit Committee and the Board of Directors to promote continuous improvement of the Company's ethics and compliance framework.

This Policy shall be reviewed at least annually, or earlier if required by regulatory changes or internal developments, and updated upon approval by the Board of Directors.

*This Ethics & Compliance Policy was adopted by the Board on September 2006; last revised in November 2025.*