

SUPPLIER CODE OF CONDUCT

PURPOSE AND SCOPE

Danaos Corporation, along with Danaos Shipping Ltd. (the "Manager"), Danaos Chartering Services Inc. and their wholly owned subsidiaries (collectively "Danaos" or the "Company"), is committed to maintaining the highest standards of business integrity and ethical conduct. 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 Supplier Code of Conduct (the "Code") articulates our expectations for ethical behavior, legal compliance, and responsible practices among all our suppliers and subcontractors. The Code aligns with our core values of sustainability, fairness, and corporate responsibility, and demonstrates our commitment to the United Nations Global Compact and adherence to international standards such as the ILO Declaration and the UN Universal Declaration of Human Rights.

1. CORPORATE GOVERNANCE AND ETHICAL CONDUCT

We expect our suppliers to operate with transparent governance structures and uphold the highest ethical standards. This commitment to integrity and accountability includes maintaining clear ownership structures, decision-making processes that embody honesty and fairness, and upholding ethical standards in all business operations, including financial transactions, labor practices, and stakeholder interactions.

2. RISK & CRISIS MANAGEMENT

Effective risk management and crisis preparedness are critical for business resilience. Suppliers are expected to conduct comprehensive risk assessments covering financial stability, operational efficiency, and reputation management. They are expected to have robust crisis management strategies in place, ensuring swift and effective response to emergencies and unexpected challenges, thereby minimizing potential impacts on their operations and the broader supply chain.

3. BUSINESS ETHICS AND COMPLIANCE

Suppliers must maintain firm ethical business practices, adhering to a zero-tolerance policy towards corruption, bribery and fraudulent activities. This includes commitment to fair competition, compliance with all relevant antitrust and competition laws, and adherence to anti-money laundering regulations. Suppliers are expected to ensure that their financial transactions and business operations do not inadvertently support money laundering activities.

4. SUPPLY CHAIN AND ESG MANAGEMENT

Sustainable supply chain management is fundamental to our operations. Suppliers are encouraged to effectively manage risks within their supply chain and incorporate Environmental, Social, and Governance (ESG) factors into their business models and strategies. By aligning with

Danaos' commitment to sustainability and responsible business practices, suppliers contribute to fostering a supply chain that is resilient, environmentally conscious, and socially responsible.

5. TAX COMPLIANCE

Suppliers must conduct their financial affairs with integrity, adhering to all applicable tax laws and regulations. Transparent tax strategies and compliance with tax obligations are essential to demonstrate a commitment to financial integrity, corporate responsibility, and lawful conduct.

6. SANCTIONS COMPLIANCE

Suppliers must comply with all applicable international sanctions, embargoes, and export control laws and regulations, including those imposed by the United Nations, European Union, United States, and other relevant authorities. Suppliers are responsible for ensuring that neither they nor their subcontractors are subject to, or engage in transactions with, any sanctioned individuals, entities, or countries.

7. INFORMATION SECURITY AND DATA PROTECTION

In our digital and interconnected world, the protection of sensitive data is of paramount importance. Suppliers must implement advanced cybersecurity measures to protect data against unauthorized access, breaches, and other cyber threats. Compliance with data privacy laws and regulations is critical to ensuring the security and integrity of sensitive information and maintaining the trust of stakeholders.

8. LABOR PRACTICES AND HUMAN RIGHTS

Upholding the highest standards of labor practices and human rights within the supply chain is a foundational principle for Danaos. Suppliers are required to respect, protect, and promote human dignity, as well as ensure compliance with applicable laws and internationally recognized standards.

Any form of forced, bonded, indentured, or involuntary labor, including human trafficking, must be strictly excluded by our suppliers' operations. All employees must be free to choose their occupation and execute their assigned tasks, without been subject to coercion, threats, deception, or penalties. Furthermore, child labor must be strictly prohibited. Suppliers are obligated to prevent child employment in occupations that are hazardous, interfere with compulsory education, or are mentally, physically, socially, or morally harmful. Both international conventions and local legal requirements for minimum age employment thresholds must be followed.

Suppliers shall secure safe and fair working conditions for their workforce, respecting the established laws and regulations on employees' working hours, resting periods, overtime and compensation. The protection of employees' physical and mental health must be among their main priorities. The establishment and active implementation of occupational health and safety policies help ensure that operations are conducted under the highest standards of health, safety, and welfare.

Discrimination of any kind is strictly prohibited. All workers must be treated with dignity and respect, without distinction or unequal treatment based on race, ethnicity, gender, sexual orientation, age, nationality, religion, disability, marital status, union affiliation, or any other status protected by law. Harassment of any nature, whether sexual or non-sexual, including bullying, mobbing, intimidation, or other abusive conduct, is likewise prohibited.

The employees' rights to freedom of association and collective bargaining must also be acknowledged and respected. Workers must be free to form and join organizations of their own choosing, to raise concerns, and to negotiate collectively without fear of retaliation, interference, or restriction.

9. ENVIRONMENTAL RESPONSIBILITY

Our commitment to environmental stewardship extends to our suppliers. We expect them to manage their environmental impact responsibly, complying with environmental laws and standards. Suppliers should maintain necessary environmental permits, implement effective environmental management systems, and engage in practices that minimize environmental harm, demonstrating a proactive approach to sustainable operations and environmental conservation.

Greenhouse gas emissions, including emissions of carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), deriving from suppliers' operations, must be closely, routinely monitored and efficiently managed. Additionally, energy consumption should be optimized through efficiency measures, equipment upgrades, and the transition toward renewable energy sources. Such measures contribute to environmental performance enhancement and climate change mitigation.

Pollution prevention and waste management practices must be incorporated into suppliers' operations. Suppliers are required to characterize, routinely monitor, effectively manage and diminish by-products including **air pollutants**, such as sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), ground-level ozone (O₃), particulate matter (PM), and lead (Pb), **sewage**, and **solid waste**, both non-hazardous and hazardous waste.

Suppliers shall efficiently utilize natural resources, including water, fossil fuels, minerals, and virgin forest products, by actively implementing business practices such as sustainable design, technological improvements, production modifications, maintenance and facility processes, materials substitution, re-use, conservation, recycling and other.

Biodiversity and natural ecosystems protection is among suppliers' responsibilities. Their operations must not result in deforestation, habitat destruction, soil erosion, or land degradation. Suppliers shall apply the mitigation hierarchy to manage biodiversity risks and ensure no net loss of natural habitats. Activities shall not take place in areas of globally or nationally significant biodiversity, while land use must be responsibly managed to preserve ecosystem integrity and promote long-term conservation.

10. ETHICS IN OPERATIONS

Maintaining the highest standards of ethical conduct in operations is essential. All suppliers are obligated to operate with integrity, transparency, and in compliance with applicable laws and recognized ethical standards.

Any form of corruption is strictly forbidden, including bribery, facilitation payments, fraud, extortion, collusion, money laundering, or the improper offer or acceptance of gifts or advantages that could influence people's judgment and actions or cause a breach of trust.

Suppliers are required to always act impartially and in the best interest of Danaos and its subsidiaries, in order to avoid potential conflicts of interest. In the event that any actual or potential conflicts of interest are identified, they must be disclosed promptly and followed by corrective actions.

Additionally, anti-competitive practices such as price fixing, bid rigging, exclusive dealing, cartel activities, or other forms of collusion used to prevent, reduce, or distort fair competition are strictly prohibited.

11. SUPPLIER COMMITMENT AND REPORTING

Suppliers are expected to align with this Code, demonstrating their commitment by monitoring compliance and reporting their performance. Effective reporting mechanisms for ethical violations or concerns are essential. This includes grievance systems for anonymous reporting and a strong policy against retaliation.

Danaos encourages open communication and provides various channels for reporting concerns, including through Danaos representatives, relationship partners, management, or the Danaos [Whistleblowing Report Form](#). We welcome concerns from all stakeholders, internal and external, regarding potential or actual violations of this Code, underscoring our commitment to ethical conduct and transparency.

12. CONCLUSION

Adherence to this Supplier Code of Conduct is integral to maintaining a successful business relationship with Danaos. We are dedicated to collaborating with our suppliers to uphold these standards, fostering an ethical, sustainable, and responsible supply chain. This commitment is a reflection of our dedication to excellence in all aspects of our business practices and corporate responsibility.

This Danaos Supplier Code of Conduct has been effective since November 2023; last revised in November 2025;