Going Green: We take it personally for Sustainability

Sustainability Report 2025

ESG Factbook

Orient Overseas (International) Limited

(Incorporated in Bermuda with members' limited liability)
Stock code: 0316.HK

Approach to Sustainability

The Group incorporates sustainability into our business operations. We have been proactively developing and managing our Environmental, Social and Governance profile through building trust with our stakeholders. With the formulation of our Sustainability Strategy, various sustainable development goals and objectives have been established in tackling global environmental and social challenges that we are facing today. Looking ahead, we will continue exploring new sustainable development opportunities to create long-term value for our stakeholders.

Sustainability Strategy

As we continue to build on our efforts and accomplishments on environmental management the development of this Sustainability Report highlights our desire to move towards a more integrated approach to sustainable development. Developing our Sustainability Strategy has been an important step to further integrate sustainability considerations into our business decision-making process.

This Strategy is driven by our corporate philosophy and we feel that there is a need to further enhance our initiatives and bring our approaches to environmental management, economic development and social responsibility together into a more coherent structure, under the umbrella of sustainable development.

In the process of defining what sustainability means to the Company, it significantly helped steer how we set our plans and goals for the future. The result is the formulation of some key sustainable development priorities to initiate while setting targets and plans for each department in the Company to embrace and execute. Going forward, the development of our Strategy will continue to be refined according to the views of our stakeholders and objectives of the Company.

OOCL Sustainability 6G Plan

Green Vessel	Green Fuel	Green Product	Green IT & Digitalisation	Green Supply Chain	Green Community
Invest in newbuilds and undertake retrofits for existing vessels	Replace fossil fuels with cleaner marine fuel and promote onshore power	Provide new sustainable shipping options	Develop AI-driven solutions and digital carbon reporting tools	Engage key business partners and vendors to commit to our ESG agenda	Participate in industry-related programmes to promote marine conservation

Stakeholder Engagement Programme

Our Stakeholder Engagement Practices – To achieve long term success and sustainability, we build and maintain lasting relationships with our key stakeholders across global operations and value chain. Under our stakeholder engagement principles, impacts on stakeholders are discussed and studied to ensure perspectives of relevant stakeholders are considered and evaluated. We establish strong communication channels to engage with as wide a variety of stakeholders as possible in order to gather their feedback towards our materiality assessment. Upon completion of stakeholder engagement process and materiality analysis, the board-level Sustainability Committee oversees and endorses the results and develops business strategies aligning with stakeholder expectations. All local operations are applicable and covered by our stakeholder engagement practices, ensuring that region-specific insights and community-level concerns are captured and addressed. This approach enables us to align our sustainability priorities with the expectations of stakeholders in each operating region.

Aligning with our stakeholder engagement principles, respective engagement programmes have been deployed to identify and prioritise stakeholders based on their interest, influence and impacts on our business activities. Considering these three factors, we have identified and engaged more than 2,000 stakeholders from 10 key groups through various channels. Our key stakeholder groups include academic institutions, business partners, customers, employees, local communities, non-governmental organisations, professional & industry bodies, regulators & authorities, shareholders & investors, and suppliers & vendors. In addition to these key stakeholders, minority groups could also be included in the identification process through corresponding non-governmental organisations. Although these groups represent a small portion of the community, their needs and concerns should be respected and taken into account when formulating corporate strategies. This also echoes the Group's commitment to building an inclusive business environment with equal opportunities and anti-discrimination.

Communication Channels – We maintain a variety of communication channels to facilitate open, transparent and two-way communication with stakeholders. These channels include stakeholder consultations, meetings, industry forums, community engagement activities, public disclosures and designated communication platforms through which stakeholders can provide feedback, raise concerns or seek further information about our operations and sustainability initiatives.

Capacity Building and Awareness – As part of our Stakeholder Engagement Programme, we seek to facilitate informed and meaningful stakeholder participation through transparent communication and information sharing. We engage with relevant NGOs, industry associations, community organisations and other stakeholder groups to communicate our sustainability initiatives, performance and key developments, while encouraging stakeholders to share their views and concerns through established engagement channels. These activities help stakeholders better understand our operations and sustainability approach, fostering constructive dialogue and ongoing engagement.

Stakeholder Impact Assessment – We seek to understand and manage the actual and potential impacts of our operations on local stakeholders and communities. Through regular engagement with local stakeholders, community outreach activities and operational reviews, we identify sustainability-related concerns, expectations and emerging issues relevant to our operations. Feedback gathered is considered in the evaluation of social, environmental and operational risks and supports the development of appropriate management responses and mitigation measures.

Stakeholder Dialogue and Feedback – Regional teams maintain ongoing dialogue with local stakeholders through meetings, consultations and other engagement activities. These interactions enable us to better understand stakeholder perspectives, identify emerging sustainability-related issues and concerns, and consider such insights in the management of business operations and sustainability matters. We welcome feedback from stakeholders regarding sustainability-related matters and our stakeholder engagement approach. Through stakeholder engagement exercises, consultations and ongoing communication, stakeholders are provided with opportunities to share their views, expectations and suggestions. Feedback received is considered as part of the continuous review of our stakeholder engagement strategy and helps inform improvements to future engagement activities and communication channels.

Stakeholder Grievance Handling, Resolution and Service Improvement – Stakeholders may raise concerns, enquiries or grievances through established communication channels. The Group maintains a formal process to receive, record, track, investigate and address issues raised by stakeholders in a timely manner. For customer-related complaints, acknowledgement is provided to confirm receipt of the complaint and, where appropriate, customers are informed of the complaint handling procedures, including expected timelines for investigation and resolution. Feedback and insights obtained through complaints, enquiries and other customer interactions are reviewed and, where appropriate, considered in the enhancement of service offerings, operational processes, digital solutions and customer support initiatives.

Materiality Assessment

The process of stakeholder engagement is central to materiality assessment and serves as a channel for us to engage with our stakeholders. With the sound and effective Enterprise Risk Management system, we are able to integrate the identified material issues into our risk culture and form a holistic view on the issues that our stakeholders are concerned about. From our stakeholder engagement exercise, material issues were identified by different stakeholders and were categorised into environmental, social, governance, as well as information technology & security aspects. Topics are presented on the materiality matrix based on the principle of double materiality and these topics are mapped according to the two dimensions of "significance to business" and "importance to stakeholders".

17 PARTNERSHIPS FOR THE GOALS

SDG 17 – Strengthen the means of implementation and revitalise the global partnership for sustainable development

We continue to strengthen our collaboration with various stakeholders and industry organisations.

In Progress

Materiality Matrix

1	Compliance	10	Operational risk assessment	19	Marine plastic	28	Diversity & equal opportunities
2	Anti-competitive behaviour	11	Tax transparency	20	Waste management	29	Freedom of association & collective bargaining
3	Prevention of bribery & corruption	12	Customer feedback	21	Vessel lifecycle assessment & recycling	30	Occupational health & safety
4	Political contribution	13	Biodiversity & conservation	22	Collaboration & engagement	31	Emergency response
5	Sustainable procurement	14	Energy	23	Green investment	32	IT innovation
6	Contraband management and anti-smuggling of sea cargo	15	Climate change mitigation & adaptation	24	Green Product	33	Maritime security & piracy
7	Data transparency	16	Emissions	25	Community investment	34	Cyber security
8	Grievance handling	17	Material use	26	Employee development & retention	35	Customer privacy
9	Dangerous goods	18	Water & effluents	27	Human & labour rights	36	Intellectual property rights

Sustainable Development Governance

Sustainability is one of the key elements in the Group's business development. The Group continues to improve its ESG framework during operations to ensure that sustainable development is fully taken into consideration during strategy formulation and decision-making. We have further improved our ESG framework and established the Board as the highest governance unit for sustainable development work, responsible for leadership and oversight, and obtaining different ESG support from respective Committees.

The Group's ESG Structure

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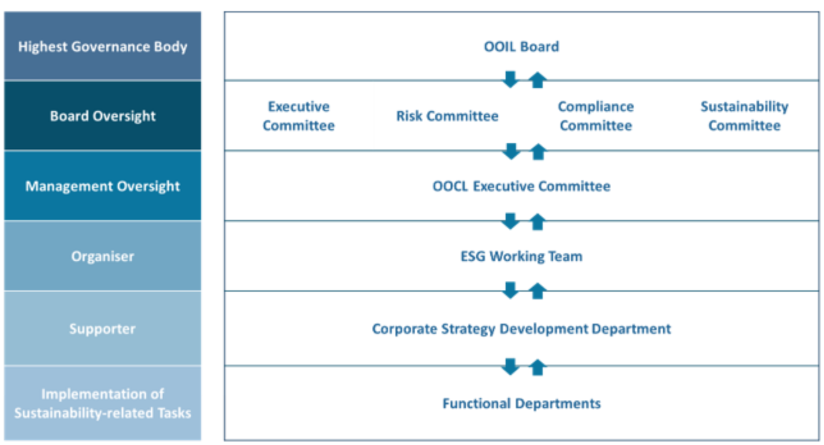
The Executive Committee, is responsible for reviewing the Group's sustainability performance, including the progress made against the ESG-related goals and targets, which considers and reports to the Board on sustainability issues that are material to the Group's business, and the recommendations of the Sustainability Committee.

Sustainability Committee, is responsible for formulating the Group's strategies, targets and management approach on sustainability, which reviews regularly the Group's sustainability performance, progress on achieving the relevant targets and the effectiveness of the sustainability frameworks, ensuring compliance with the applicable sustainability requirements. Sustainability Committee monitors and reports to the Board or relevant Board committees (as appropriate) on current and emerging sustainability-related issues considered material to the Group's business. Sustainability Committee also oversees and endorses the development and implementation of corporate sustainability policies, including but not limited to decarbonisation, climate change, biodiversity (including no deforestation), marine environment and safety, security and health. In addition, climate-related topics, an integral component of the ESG strategy, including the anticipated financial implications of climate-related risks and opportunities, are overseen and thoroughly discussed as part of the Group's sustainable development agenda during the board-level meeting. Sustainability Committee Meetings are held at least twice a year to keep the Board updated on the Group's ESG developments and performance. The Head of Sustainability of the Group is also designated to review the latest progress on ESG implementation and to oversee preparations for climate-related issues. The Sustainability Committee is authorised to seek external independent professional advice where appropriate and to ensure the involvement of outsiders with relevant experience and expertise when the Committee considers it necessary to perform its duties.



Continuous Professional Development

The Directors are committed to participating in continuous professional development program to develop and refresh their knowledge and skills to help ensure that their contribution to the Board remains informed and relevant. Regular educational training sessions are held, covering a wide range of topics, including but not limited to:

- Directors' duties & corporate governance
- Updates on regulatory requirements
- Strategic planning & business development
- Technology development and information security
- Sustainable development and risk management

More information of Induction and Continuous Professional Development can be found in our 2024 Annual Report, under the Corporate Governance Report section.

Risk Culture

The Group is dedicated to upholding a risk-intelligent culture and emphasising the importance of quality service, customers and employees. We aim to embed risk awareness and a control mindset into our corporate culture by providing training to all employees. To achieve continuous improvement in our risk management practices, the Group re-assesses risk appetite and corresponding quantitative risk tolerance limits on a regular basis in the context of the Group's prevailing capital structure and business models and has established procedures to ensure the effective implementation of risk responses. Risk appetite and quantitative risk tolerance limits are reviewed periodically by management and the Risk Committee to ensure that the Group's risk exposure remains within acceptable levels and is aligned with its strategic objectives, business environment and stakeholder expectations. Our process allows functional units identify and report material risk events through established channels so that the right information can be communicated at the right time to the right people.

Risk Management Framework

The Group has set up and integrated risk management framework with a "three lines of defence" model as a precautionary approach to identify, evaluate and manage major and significant risks, including climate-related and ESG-related risks, that may bring material impact on the Group's business. The Group's Enterprise Risk Management is a group-wide, integrated framework for managing risks for the Group and consists of assessment of the likelihood and magnitude of the impact of identified potential risk events. These events are identified and prioritised according to their influence and impact on the Group's strategies, objectives and ability to achieve objectives. This framework helps the Group to achieve business objectives and manage unexpected business volatility and to create value. Under the model, corporate functional units act as the first line of defence, LRM Risk Unit act as the second line of defence with Internal Audit Department being the third line of defence. The Group monitors risks using a principal risk dashboard and a functional risk dashboard. Principal risks refer to major risks whose potential consequences are significant at a group level, for instance, ESG risks and cyber security issues. Functional risks refer major risks of an operational nature, capable of being quantified in the form of key risk indicators and monitored regularly at the level of functional units.

On behalf of the Board, the Risk Committee sets the strategic direction for multi-disciplinary risk management, which covers operational, climate change mitigation, health & safety, human rights, anti-corruptions, and other business and ESG issues. These specific risks are owned, identified, proceeded and assessed by the company-wide functional units. As part of the risk review process, key risks are assessed based on both their likelihood of occurrence and potential magnitude of impact on the Group's operations, financial performance, reputation and stakeholders. The precautionary and mitigating responses proposed by functional units are checked, measured and monitored by LRM Risk Unit through the functional risk dashboard. Key risks identified are reviewed regularly by the Group's management. The effectiveness of the risk management system is assessed by the Internal Audit Department. The Board conducts review on the effectiveness and adequacy of the risk management and internal control systems by reviewing the work performed by the Risk Committee and Audit Committee annually.

Case Review	Risk Exposure (Likelihood & Magnitude)	Key Mitigating Actions
Cybersecurity & Information Security	Given the increasing frequency and sophistication of cyber threats across the global shipping and logistics industry, cybersecurity risks may lead to unauthorised access to information systems, disruption of business operations, compromise of customer data, regulatory non-compliance and loss of stakeholder confidence. Such incidents may have significant operational, financial and reputational consequences for the Group.	• Information security governance framework • Cybersecurity monitoring and threat detection • Access controls and user authentication mechanisms • Incident response and recovery procedures • Regular security assessments and testing • Employee awareness and cybersecurity training
Climate-related Risks	Climate-related risks may arise from increasing extreme weather events, evolving regulatory requirements and the global transition towards a lower-carbon economy. These factors may affect operational continuity, increase compliance and transition costs, and influence customer demand and market competitiveness, thereby affecting the Group's long-term business performance and resilience.	• Fleet efficiency improvement initiatives • Investments in decarbonisation and emissions reduction measures • Climate risk monitoring and assessment • Ongoing review of regulatory and market developments • Operational resilience and business continuity planning

Emerging Risks Management

The shipping industry is navigating a rapidly evolving risk landscape shaped by technological advancements, geopolitical shifts, and regulatory uncertainties. As a global container shipping company, OOCL actively monitors emerging risks that could significantly impact our operations and long-term strategy. We continuously evaluate market developments and explore a range of preventive and mitigation measures to uphold service reliability and business resilience. Through broad, cross-functional risk assessments and strategic planning, we aim to stay ahead of emerging challenges and safeguard the sustainability of our shipping services.

Case Study	Geopolitical Tensions Impacting Global Trade Routes	Regulatory Uncertainty Around Future Maritime Low-carbon Standards
Detail	Increasing geopolitical tensions—such as trade disputes, regional conflicts, and protectionist policies—can lead to long-term shifts in global trade flows and port accessibility. For example, trade wars between major economies have triggered tariff hikes and changes in cargo volumes, requiring the shipping industry to revise service routes and port calls. Additionally, the ongoing crisis in the Red Sea has caused significant disruptions and heightened security risks along Asia–Europe trade lanes, forcing carriers to reroute vessels and adjust schedules to maintain operational efficiency and customer satisfaction. These external challenges demand agile planning and strategic flexibility to ensure business continuity.	Although the maritime industry has committed to achieving net-zero emissions by 2050, uncertainty remains around the long-term decarbonisation agenda. New regulatory frameworks such as the IMO's Carbon Intensity Indicator (CII), FuelEU Maritime, and the EU Emissions Trading System (EU ETS) have been introduced, but market consensus on implementation strategies, compliance mechanisms, and future targets is still evolving. This regulatory ambiguity poses an emerging risk for shipping companies, especially given the long lifespan of vessels and capital-intensive nature of fleet investments. Planning for future fleet composition and business strategy becomes increasingly complex without clear, stable guidance on long-term emissions requirements.
Impact to Our Business	Geopolitical instability has led to potential disruptions in our trade routes, resulting in increased transit times and higher operational costs. Adjustments to strategic fleet deployment and port agreements are needed to maintain long-term service reliability and manage profitability. In response to the ongoing Red Sea crisis, involved operated vessels have either been rerouted or suspended from sailing through the region. For vessels diverted via the Cape of Good Hope, cargo delivery times may be extended due to the significantly longer sailing distance, impacting schedule reliability and overall shipping efficiency.	The lack of long-term clarity in maritime emissions regulations presents strategic challenges for business planning. Evolving frameworks without market consensus make it difficult to forecast compliance and investment needs. With vessels lasting 20–30 years, uncertainty around future emissions thresholds complicates decisions on fleet renewal and technology adoption. Clarifying this ambiguity is essential to avoid the risk of stranded assets and misaligned capital allocation, ensuring that long-term investments align with future regulatory expectations.
Our Mitigation	To address the impact of geopolitical uncertainties on global trade routes, OOCL has implemented a flexible routing strategy and contingency plans for high-risk regions to ensure service continuity. We have strengthened partnerships with alternative ports and regional logistics providers to support rerouting efforts and minimise disruptions. In addition, we closely monitor global developments to stay informed and respond swiftly to emerging risks. These proactive measures enable OOCL to maintain operational resilience, uphold customer satisfaction, and adapt effectively to the evolving geopolitical landscape that continues to shape the container shipping industry.	OOCL leverages Global Vessel Voyage Monitoring Centre (GVVMC)'s foundation and AI-powered Robo-advisor to enhance marine operations. The tool provides berth visibility and bunker optimisation, while its emissions tracking module swiftly integrates new rules, proactively predicting and alerting the potential compliance risk. We also explore and invest in a wide range of solutions, including methanol-compatible vessels, intelligent performance monitoring systems, and advanced technologies, empowering our marine operations team to continuously refine emission control strategies, aligning with short-, mid-, and long-term pathways toward carbon neutrality.

Our Policies

Anti-Corruption - In the interest of adhering to the highest ethical standards, the Group has a formulated Code of Conduct which serves as a guideline to ensure compliance with all local, national and international legal standards and to preclude offences under local, national and international laws, any breaches of confidentiality, non-disclosure requirements or intellectual property rights and any conflicts of interest, acts of bribery, corruption or political contribution and any other areas of deemed misconduct. Our Management approves and takes oversight implementation of our policies against bribery and corruption very seriously. The Group's Code of Conduct has a chapter on "Bribery and Corruption" which provides a clear and comprehensive guidance on how to conduct business in an ethical, fair and legal manner. The Company will regard any violation of this policy as a serious matter and it will result in disciplinary action, including employment termination, that is consistent with relevant and applicable laws. Regional and function-specific training on anti-corruption and anti-bribery policies are offered to our employees. In addition, comprehensive procedures are in place to address, identify, manage and control risks and violation cases that may contain elements of corruption and bribery, with an impact on the business of the Group. These procedures are covered in the Group's "Whistle Blower Policy".

We conduct a mandatory vendor assessment for all new intermediaries including vendors, suppliers, agents, and contractors to confirm their compliance to our Code of Conduct. This assessment serves as a channel to communicate with our intermediaries regarding our company policy. Once operations along our value chain are identified to be at high risk for corruption, comprehensive anti-corruption procedures would be applied to address the issue, which may come in forms of all kinds of bribe, misconduct, and facilitation payment. It allows us to take immediate actions if any corruption and bribery risks are identified. OOCL is a member of the Maritime Anti-Corruption Network (MACN), working together to eliminate all forms of maritime corruption and foster fair trade practices. Following the MACN Anti-Corruption Principles, we avoid all kinds of bribe, facilitation payment, and corruption by adopting shared methodologies, framework, risk assessment tools, training, and campaign, helping our employees and third parties to strengthen the anti-corruption approach. Not only do we work with MACN, but our Company also engages with different industry members, local governments and civil societies to reinforce and promote the culture of integrity through collective action.

Our policy sets out clear guidelines on payments, gifts, entertainment, gratuities, charitable contributions, sponsorships and other benefits, and prohibits their use for improper purposes. Such arrangements must not be used to influence decisions, obtain an unethical business advantage or create any conflict of interest.

Our current approach is considered to be effective and sufficient. During the reporting period, we were not aware of any reported cases of corruption within the Group and we ensure that all our practices are in full compliance with relevant laws and regulations. Any reported concern or suspected breach of our Code of Conduct and related policies will be promptly and thoroughly investigated, and appropriate corrective or disciplinary action may be taken in accordance with the Company's established procedures. We will continue monitoring and reviewing our policies and practices to maintain "zero corruption". We constantly monitor and evaluate the need to launch comprehensive anti-corruption risk assessments for our existing and new global offices, business partners, vendors, suppliers and agencies.

Whistle-Blowing Framework – The Group's "Whistle Blower Policy" is one of our formalised procedures through which employees can anonymously file reports or register concerns and help govern the reporting and thorough investigation of allegations of suspected improper activities. Information on how to report suspicious cases under this policy is communicated to all employees during orientation and Code of Conduct training. Concerns regarding accounting, internal accounting controls and auditing matters can be reported by employees to the Audit Committee without fear of dismissal or retaliation and handled under our established investigation procedures. Where appropriate, relevant parties are informed of the investigation process and kept updated on the progress and outcome of the investigation until the reported matter has been resolved. The Audit Committee will review each complaint, the investigations and the follow-up actions, including disciplinary actions, by management on substantiated cases. This framework helps ensure that the Group complies with all the applicable laws and regulations, accounting standards, accounting controls and audit practices. Subject to necessity, independent third-party reporting channel would be engaged to handle abnormal cases.

Extortion, Fraud, Money Laundering & Other Related Crimes – The guidepolicy of Code of Conduct requires all employees to comply with any laws, rules and regulations that are aimed at preventing, detecting and remedying economic crime and, in particular, fraud, extortion, money laundering and other related crimes. Employees must not engage criminal activities nor choose to ignore them. We ensure that all our business practices and operations are in full compliance with relevant laws and regulations and during the reporting year, no such crimes have been discovered.

Sustainable Value Chain

To achieve sustainable development and better manage the ESG risks throughout the whole value chain, we actively engage and closely collaborate with our business partners and customers. We also strive to maintain our operational agility and move quickly to adopt to any changes in the global supply chain, thereby enabling us to ensure customers are well-served with the best selection and most competitive suite of services.

Sustainable Procurement – Our Management oversees and endorses the implementation of the Sustainable Procurement Policy and related ESG supply chain management practices. In exploring areas to promote environmentally friendly procurement when selecting vendors and suppliers, we have set up the Sustainable Procurement Policy to guide our colleagues in monitoring the procurement specifications and their deliveries. To prevent potential conflicts with our ESG requirements and ensure effective compliance, we will review our procurement practices with suppliers where necessary.

Sustainable Procurement Policy

We are dedicated to promoting sustainable and responsible practices and our Corporate Sustainable Procurement Policy has been implemented in every aspect of our business and at every stage of the supply chain to manage and assess environmental and social risks.

OOCL is committed to:

- Reducing harmful pollutants and emissions
- Promoting greater environmental sustainability at every stage in the supply chain by conserving resources
- Promoting awareness among our suppliers of our expectations with regard to Safety, Quality and Environmental Protection
- Promoting ethical sourcing practices
- Contributing back to our community

During the reporting period, we were not aware of any of our suppliers being assessed as having a material negative impact.

Vendor/Supplier Management – To achieve our sustainable procurement objectives at every level of the supply chain, an assessment of existing and new vendors, suppliers, agents, and contractors must be completed to confirm their compliance to our ESG standards through the OOCL Vendor ESG Assessment Platform. If deemed necessary, we would conduct audits in vendors' facilities. Through the platform, applicable suppliers can access assessment requirements (covering environment, social, health & safety, governance, and information security & privacy) and view the process of their assessment. Our procurement team and relevant internal stakeholders receive regular training on their roles in the supplier ESG programme to support the integration of ESG considerations into supplier management activities. ESG performance is considered as part of our Supplier Annual Evaluation and forms one of the key assessment criteria when selecting applicable suppliers. The results of the ESG assessment are taken into account alongside other operational and commercial considerations in supplier selection and engagement decisions.

As part of our supplier application and management process, suppliers are required to adhere to our social, environmental and ethical codes integrated into our commercial practices. These standards include legal compliance, occupational health and safety, environmental management, privacy and data protection, prohibition of child and forced labour, non-discrimination, and community responsibility and sustainability. As minimum eligibility requirements, prospective suppliers must comply with all applicable environmental, health and safety regulations, privacy and data protection requirements in accordance with our information security and privacy policies, and our Code of Conduct. Please see the following sections for further details on the Supplier Code of Conduct and Safety, Security and Environment (SSE) Policy applicable to our suppliers.

Regularly internal review is in place to ensure suppliers' alignment with our ESG requirements and the Supplier Code of Conduct. If any failure to meet our minimum ESG requirements is identified without a timely corrective plan in place, involved suppliers, vendors, agents and contractors would not be considered for contracts and existing contracts can be terminated immediately (depending on severity).

Supplier Corrective Action Plans – Where actual, suspected or potential non-compliance with our supplier standards, policies or applicable requirements is identified, suppliers may be required to establish and implement corrective action plans to address the underlying issues. Where improvement opportunities are identified, we communicate our expectations to suppliers and may provide remote or on-site guidance to support the timely implementation of corrective and improvement actions. Follow-up reviews may be conducted, where appropriate, to monitor progress and verify the effectiveness of the corrective actions.

Our Code of Conduct (Summary)

OOCL is committed to honesty, integrity and fairness in its business conduct and organisation management. OOCL also maintains the highest standards of professional ethics and integrity in dealing with its customers, vendors and partners.

Highlights of OOCL's Code of Conduct:

1. Legal Compliance
   - Comply with all applicable laws and regulations in the countries in which the Company operates.

2. Prohibition of Bribery and Corruption
   - Do not accept or offer gifts of material value, entertainment, or other gratuities of worth from or to business partners, in exchange for business opportunities or any privilege that can raise doubts as to objectivity and fairness of business decisions. Such offers include, but not limited to, cash, gifts, business opportunities or contracts, travel, entertainment and other expenses. Anyone aware of or suspect a violation must report to the competent authorities in the Company.

3. Political Contribution
   - We do not make any offer, payment or gift of material value, or promise of such, directly or indirectly, to any government or public official, political party or its representatives, candidate for political or governmental office.

4. Managing Conflict of Interest
   - Staff must declare and report any conflict of interest, directly or indirectly, that may impact fair business dealings and objective decisions. Where such conflicts exist by circumstances, alternative arrangements must be made to ensure fairness and objectivity.

5. Adherence to high ethical standards by respecting rights and dignity of all persons with whom we deal. Specifically we respect the provisions of the UN Universal Declaration of Human Rights and the Conventions of the International Labour Organization in regard to:

   - Elimination of all forms of forced, compulsory and child labour
   - Freedom of employment & association
   - Respect for the individual and elimination of discrimination through embracement of diversity in workplace
   - Safe and healthy working conditions
   - Payment of living wages and regular employment entitlements
   - Non-excessive working hours

6. Assurance of non-disclosure of the Company's business, customers and financial information and no misappropriation of our tangible or intellectual property.

7. Commitment to OOCL's Safety, Security and Environment (SSE) Policy.

8. Competition
   - Conduct business activities in compliance with applicable competition laws and regulations of respective countries and tradelanes. Such activities include, but not limited to, communication, negotiation and documentation with customers, suppliers and competitors of the Company.

Customer Relations

Identity Verification – OOCL prioritises shipment security and customer relations. Our booking acceptance policy and the Customer Profile (CPF) verification guidelines are the foundation to providing a clear accountability of each functional unit in verifying the validity of each customer and its legal identity against sanction lists, including those under the United States (US) and European Union (EU). In addition, a procedure has been developed to oversee the status of the CPF records and to switch them into an inactive status when they are not being utilised within two years. In order to ensure the entire supply chain is well controlled and managed, we are continuously refining our policy and workflows.

Feedback Handling – In line with our Customer Focus core value, we treasure all feedback from our customers. To facilitate the collection of customer feedback, we have added a “Customers Feedback” page on our corporate website at www.oocl.com. Besides, our artificial intelligence (AI) -powered customer service ambassador Fin is already on board our FreightSmart platform. Fin acts as a chatbot around the clock, providing instant online assistance to our customers' enquiries. Customers can use the "Ask Fin" button to share their feedback on our services and enjoy a more personalised experience at any time.

The purpose of this process is to ensure feedback from customers will be handled in an organised and timely manner so that appropriate action can be taken to address their concerns. Feedback may generally fall into two main categories; namely appreciation and complaints. Complaints may be service-related or on our Code of Conduct. Proper records on handling customer feedback must be maintained to enable us to learn from experience. Customary complaints are received and dealt with. Through diversified channels such as regular meetings, business visits and tradeshows every year, the Company has been reaching out customers to understand their expectations while satisfaction survey can be adopted where applicable, to understand customers’ needs and improve our service quality. In 2025, we received in total 223 complaints in relation to our service and all complaints were handled with appropriate actions in a timely manner.

Fair Competition – We support fair competition with the objective of ensuring prudent and just practices across our value chain, and we consistently strive to tackle anti-competitive behaviour. Competition law compliance is an integral part of business for all corporations operating in the global market place. Under the vigilance of our Competition Compliance Committee and the Competition Compliance Working Team, a comprehensive Competition Compliance Policy is in place together with appropriate programme, guidelines and mandatory training to ensure that all our practices are in full compliance with competition laws.

FreightSmart – FreightSmart is an online platform providing instant quotation as well as booking with space and equipment protection from OOCL. Customers are able to quote, order and book with OOCL anywhere, anytime online. The highlights of FreightSmart include product variety, instant order-placing, and space and equipment protection. Broad selection of Global Trade Routes for the available service loops are on shelf with high visibility on FreightSmart. On the platform, customers can get real-time price quotations anytime simply with a few clicks. Once an order is placed, FreightSmart will secure the rates, ocean freight rate and all standard Origin and Ocean Surcharges, while space will be immediately reserved for customer.

FreightSmart Ambassador, Fin – Fin is the FreightSmart virtual ambassador on our website and social media, welcoming our customers with intelligence, care and teamwork. The chosen design for Fin represents the Chinese White Dolphin, a protected species that inhabits the coastal waters of southern China near our Hong Kong headquarters. As a customer-centric organisation, we seek to demonstrate the same helpfulness deliver a friendly and welcoming experience to our customers that dolphins show to their podmates.

OOCL FREIGHTSMART

Corporate Safety, Security and Environment (SSE) Policy

OOCL goes the extra mile to make safety and security a top priority in our business operations, onshore and at sea, including people, cargo, ships and facilities. We maintain the highest safety and security standards and recognise that businesses must take responsibility for their industries' effects on the environment so OOCL proactively demonstrates our concern for the environment at every level of our organisation.

OOCL is committed to:

- Applying industry best practices, and going above and beyond compliance with relevant rules and regulations on Safety [1], Security [2] and Environment [3]
- Establishing and improving safety, security and environment objectives and targets
- Proactively promoting an Onboard Safety Culture and engaging in the highest levels of training
- Participating fully in the prevention and suppression of security threats against supply chain operations under our control and carrying out risk assessment on a continuous basis
- Using resources [4] efficiently and applying innovative voluntary measures to minimise the impacts on the environment and natural resources
- Regularly communicating our SSE Policy to all staff and business partners throughout the supply chain
- Continually re-assessing and upgrading our SSE commitments
- Serving our stakeholders by assessing their needs and providing information
- Taking every precaution to avoid any health & safety risks in business activities and services to employees, business partners and communities
- Identifying, evaluating and mitigating climate-related issues and risks in our business operations

OOCL evaluates opportunities for working with responsible business partners to achieve our sustainable procurement objectives at every level of the supply chain. We also strive to ensure that our commercial relationships are formed with partners that share our values on safety, security and environmental care and sustainable business practices.

[1] "Safety" includes but is not limited to the providing of a safe working environment to protect employees from occupational hazards.
[2] "Security" includes but is not limited to the preventive measures to ensure security onshore and onboard, as well as cyber security.
[3] "Environment" includes but is not limited to air and greenhouse gas emissions, discharges into water and land, generation of hazardous and non-hazardous waste, biodiversity and climate-related issues.
[4] "Resources" include but are not limited to energy, water and other raw materials.

Our strategies and approaches to sustainable development drive a long-term value creation for our business and stakeholders. As stated in OOCL's Safety, Security and Environment (SSE) Policy and Sustainable Procurement Policy, we maintain high environmental standards throughout our whole supply chain and at different stages of business operations, covering vendor/supplier management, delivered services to customers, newly deployed projects and facilities, transportation/logistics processes and management of generated waste. These policies are primarily focused on addressing the risks and opportunities in our business and incorporate the economic, environmental and social approaches to sustainability into our decision-making process.

Consistent with our SSE principle of Continuous Improvement, we recognise the importance of consultation and engagement with our employees and seafarers in maintaining effective and up-to-date sustainability, safety, security and environmental standards. We encourage the participation of workers and, where applicable, their representatives in supporting the continual improvement of our policies, practices and performance, and are committed to maintaining a safe, secure and healthy working environment for our employees and seafarers, consistent with our DMLC commitments and applicable Collective Bargaining Agreements.

Climate Change and Environment

We recognise that businesses must take responsibility for their industry's effects on the environment. Our Company is dedicated to meeting the needs of the present without compromising those of the future. We consistently encourage sustainable economic development through measures of innovative environmental care and a solid management approach.

Climate-related Risk Management

OOCL realises the urgency and importance to decarbonise shipping and develop greener fuels. In addition to OOCL's consistent efforts in improving energy efficiency in our operations over the years, we have invested in dual fuel green vessels and have been proactively exploring the development of cleaner alternative fuel, especially green methanol, to achieve the goal of Net Zero by 2050. Moving forward, we will continue to fully support all efforts driving the industry towards a greener future. OOCL strives to reducing air emissions from our vessels and fully supports the latest IMO Strategy on Reduction of GHG Emissions from Ships. We have developed a comprehensive decarbonisation roadmap and targets for our owned fleet and global offices. Relevant targets and progress have been independently validated. To align with the IMO Net-zero Framework to pursue a zero-carbon future consistent with the latest international agreement, the Paris Agreement, we have also introduced indicative checkpoints (compared to 2008) to reach net-zero GHG emissions from international shipping by 2050:

- By 2030, reduce the total annual GHG emissions by at least 20%, striving for 30%
- By 2040, reduce the total annual GHG emissions by at least 70%, striving for 80%

Given the scientific backup for potential climate change impacts and more stringent climate-related regulations and market initiatives expected to come, we refer to the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) to shed light on our governance, strategies, risk management, metrics and targets regarding climate-related risks and opportunities.

Climate Scenario Analysis – The Fourth IMO Greenhouse Gas Study was published to serve as an industry-specific reference to climate scenarios with various emissions projections. The transport work demand and emissions projections made in the study are based on both long-term socio-economic scenarios and energy scenarios.

The study adopted the shared socio-economic pathways (SSPs) and representative concentration pathways (RCPs) developed by the Intergovernmental Panel on Climate Change (IPCC), as well as the long-term baseline projections developed by the Organisation for Economic Co-operation and Development (OECD) for constructing different climate scenarios. One of the scenarios in the study combines the ambition of the latest international agreement on climate change and the OECD baseline by assuming a relatively modest economic growth and an energy scenario for non-shipping sectors would limit the temperature increase to under 2°C by the end of this century. The following changes between 2018 and 2050 are projected by IMO for the container shipping industry: increase in emissions by 20% to 70%, increase in transport work by 70% to 140% and improvement in operational efficiency by around 30% due to an increase in sizes of ships and compliance with the EEDI regulation. RCP2.6 (low-emissions scenario) and RCP4.5 (medium-emissions scenario) developed by the IPCC are considered to assess potential physical risks on our business operations and activities.

In assessing the financial implications of transitional risks, we considered both Net Zero Emissions (NZE) 2050 and Stated Policies (STEPS) scenarios simulated by the International Energy Agency (IEA) to evaluate potential regulatory impacts, market shifts and strategic alignment under varying policy intensities and timelines toward decarbonisation. Also, the analysis can be refined to identify the impacts and business implications by referencing the following SSPs: "SSP1-2.6 (<2°C)", "SSP2-4.5 (2-3°C)" and "SSP3-7.0 (3-4°C)". The global climate projections reported in IPCC AR6 are covered, namely temperature, precipitation, mean sea level, extreme weather events, ice and snow as well as tropical cyclones.

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	Risks	Impacts (e.g.)	Financial Implications (e.g.)
Physical	Acute Physical Risk	• Disruption Operation • Loss and Damage • Vessel Rerouting	Delayed Operations
Physical	Chronic Physical Risk	• Speed-up of Wear and Tear • Reduction of Cargo Load • Surcharges Imposed	Increased Operating Expenses
Transitional	Policy and Legal Risk	• Stringent Regulations • Imposition of Carbon Pricing Regulations • Enhanced ESG Disclosure Regulatory Requirements	Reduced Revenue
Transitional	Technology Risk	• Technology Breakthrough • Substitution of Existing Vessels	Increased Capital Expenditure
Transitional	Market Risk	• Change in Customer Preference • Green Fuel Price and Supply Instability • Compatibility of Green Energy Application	Loss of Assets
Transitional	Reputational Risk	• Enhanced ESG Disclosure Business Requirements • Customer Demand for Green Shipping	Impact ESG Rating

Proportionate Climate Disclosures and Analysis – Proportionality mechanism is adopted in relevant climate-related disclosures, aligning the level of detail with our operational scale, data availability and material climate risks. This approach ensures disclosures remain practical, decision-useful and appropriate to our business context. Our analysis of potential climate-related financial impacts encompasses all core business activities, including our globally operating vessels. The insights derived from the analysis of our chosen scenarios can strengthen our own climate assessments to gauge the resilience of our operations against the uncertain physical and transition risks brought by climate change.

Climate-related Risks, Opportunities and Financial Implications – A climate risk assessment has been integrated into the group-level risk management processes. The assessment was conducted with reference to the adopted RCPs, SSPs and different emission scenarios. The integrated risk management model includes processes for identifying and prioritising risk events, assessing their impact, managing responses, controlling activities, and monitoring. This model also demonstrates how key corporate risks and opportunities identified through climate-related scenario analysis can be effectively managed and incorporated in the overall risk management process. In addition, the nature, likelihood and magnitude of the effects of related risks are taken into account, and climate risk assessments are conducted in conjunction with input from various departments. The likelihood and impact of risks are considered as factors in identifying, evaluating, monitoring, and prioritising material climate-related physical and transition risks and opportunities at different stages of our value chain, covering our fleet, office and logistics operations, activities from our upstream (e.g., terminal operators) as well as downstream (e.g., warehousing and last mile delivery). During the reporting period, there were no significant changes to the Group's climate-related risk management processes.

Physical risks refer to the impacts attributed to climate change, for instance, how business operations and activities are affected by acute extreme weather events and chronic shifts in climate patterns. Transition risks refer to the impacts brought about by the policy, legal, technology, and market changes entailed in the transition to a lower-carbon economy. The time horizons of the identified risks are consistent with the useful life of our main tangible assets, vessels, and is referenced to national and international policies to develop strategic plans for different stages. 'Short-term' impact refers to the potential effects of related risks and opportunities within one year. 'Medium-term' impact covers a duration of up to five years, while 'Long-term' impact pertains to effects lasting more than five years. To reasonably understand the financial impacts of climate change, the Company conducted climate-related scenario analysis during the reporting period. This analysis assessed the current and anticipated financial effect of climate risks and opportunities in the short, medium or long term under various scenarios based on its business model, operation strategy and resource allocation across the value chain:

Metrics and Targets – Based on the risks and potential impacts identified, it is reasonable to conclude that GHG emissions are one of the most material climate-related issues for the Group. Relevant KPIs, including Scope 1 and Scope 2 emissions are adopted to assess our exposure to climate-related risks and opportunities. Meanwhile, we are constantly reviewing the need to expand our current coverage of Scope 3 emissions to better understand climate-related risks and opportunities along our value chain. For figures of the Group's GHG emissions, please refer to Appendix I: Performance Data Summary in this report. Reduction targets of Scope 1 and Scope 2 emissions intensities are discussed in later part.

Case Study – Panama Canal Drought

Panama experienced more frequent drought conditions and falling water levels due to extreme climate conditions in recent years. Panama Canal Authority decided to limit the volume of canal transits and adjust the tariff in the Panama Canal. Shipping companies were exposed to increased operating expenses caused by port congestions, route changes and prolonged turnaround time. OOCL undertook different feasible plans to mitigate this emerging risk and maintain the high quality of our services.

Impacts	Financial Implications (Current / Anticipated)
Acute physical risk – *Increasing frequency and intensity of extreme weather events e.g., cyclones and floods (Short to long term)*	
- Disruption of onshore operations including offices, warehouses, depots and trucking - Rerouting by vessels and increase in bunker consumption - Cargo loss and container damage - Speed-up of wear and tear, thus repair and maintenance - Deterred port operations, delay in cargo loading and other crucial tasks when vessels are berthed	- Increased operating expenses (OPEX) from increased bunker consumption, delayed operations, repair and maintenance, purchase of advanced weather routing system, increased management fees and increased insurance premiums - Reduced revenue due to cargo loss - Loss of assets
Chronic physical risk – *Increased GHG emissions leading to global warming and changes in precipitation patterns leading to increased frequency and severity of droughts (Short to long term)*	
- More energy required by air conditioning systems and reefer to maintain normal operations - Slot reservations cutting due to canal volume limitations by port or canal authorities and the low water levels of rivers - Surcharges imposed by canal authorities to maintain thoroughfares' levels - Rerouting by vessels and prolonged turnaround time increase bunker consumption - Reduction in cargo load to prevent grounding	- Increased OPEX from surcharges, tariffs and energy consumption - Reduced revenue due to reduced cargo load
Policy and legal risk *(Short to medium term)*	
- More stringent decarbonisation and energy efficiency regulations - Imposition of carbon pricing regulations such as carbon tax and market-based mechanisms like cap and trade - Enhanced compliance requirements for sustainability reporting, environmental data collection and carbon emissions disclosure by various regulatory institutions	- Increased OPEX for compliance purposes - Increased capital expenditure (CAPEX) for investment in more energy efficient vessels and equipment - Reduction in asset value and original investment returns from stranded assets
Technology risk *(Medium to long term)*	
- Technology breakthrough required for the industry to transit to low-carbon operations, including alternative low-emitting fuels with high availability, reliability, compatibility with vessels and presence of the corresponding bunkering facilities - Substitution of existing vessels or their equipment with lower emissions options	- Increased CAPEX for investment in more energy efficient vessels and equipment
Market risk *(Short to medium term)*	
- Change in customer preference and reduced demand for services from shipping companies with higher GHG emissions intensities - Price and supply instability of reliable alternative fuels - Uncertainty about the compatibility of green fuel related equipment	- Reduced revenue if the reduction trend of GHG emissions intensity could not meet customers' expectations - Increased OPEX and CAPEX for alternative fuels and related equipment
Reputational risk *(Short to medium term)*	
- Customer demand for shipping decarbonisation, manifested through both individual pledges for net zero emissions throughout customers' supply chains and collective call-to-action initiatives - Increased requirements for sustainable development disclosure by the capital market - Heightened attention from core customers on the company's environmental performance and disclosure	- Reduced revenue if the reduction trend of GHG emissions intensity could not meet customers' expectations - Impact on company ESG ratings and stock price performance

Decarbonisation Measures

A variety of measures needs to be deployed to achieve the established environmental targets. Taking into account IMO estimates and our own business conditions, the potential carbon reductions from our decarbonisation measures are approximated as follows.

Measure	Potential GHG Reduction* (%)
Extensive speed optimisation	Up to 75%
Fleet management, logistics and Incentives	5% – 50%
Concept, speed and capability	2% – 50%
Biofuels	20% – 25%
Power and propulsion systems	5% – 15%
Hull and superstructure	2% – 20%
Voyage optimisation	1% – 10%
Energy management	1% – 10%

** Taking reference of the International Maritime Organisation's estimation and considering our own business circumstances, the following actions carry their own weight in GHG emissions reduction.*

Over the years we have been conducting retrofits on carbon-intensive vessel equipment. This step allows us to further reduce existing vessels' carbon intensities, before phasing out any potential stranded assets. When developing newbuilding plans, we take into account climate-related risks and opportunities, specifically to align these capital expenditures with the industry's decarbonisation targets. As the lifespan of a container vessel can last for a few decades, its environmental impacts over the whole useful life are forecasted to ensure that it is aligned with our GHG emissions reduction roadmap.

Climate-related Transition Plan

Investment in Climate Change and Environmental Protection – We see businesses that take a proactive role in encouraging and managing current and future economic, environmental and social development through innovation will prosper as leaders in a highly competitive and changing global business environment. Therefore, OOCL is very serious about sustainability investing. Furthermore, we understand that businesses must take responsibility for their industries' effects on the environment. Our Company is thus dedicated to meeting the needs of the present without compromising those of the future. We continue focusing on green investment which includes fuel-efficient vessels, and eco-friendly machineries and equipment. By doing so, we believe this reinforces our commitment to customers that we offer them the best service quality with the least impact on our environment.

We invested approximately 24% of total capital investment to address environmental issues such as air pollutions, global warming, climate change, waste management, resource management and wastewater treatment. Decision-making on capital expenditures considers and pays efforts to align with the Company's long-term GHG reduction targets. During the reporting period, we invested approximately US$370.57 million in environmentally related capital expenditures. These investments covered a range of initiatives, including newbuilding construction, installation of scrubbers, ballast water treatment systems, Alternative Maritime Power (AMP) systems, and other energy-efficiency retrofits. In addition, we incurred approximately US$766.58 million in environmentally related operating expenditures during the year, mainly driven by the use of lower-carbon and cleaner marine fuels, including biofuels and low-sulphur fuels, in support of our decarbonisation and air emissions reduction efforts. These initiatives contributed to an estimated cost saving of approximately US$33.1 million during the year, primarily through reduced bunker fuel consumption resulting from vessel retrofits and the deployment of newbuild vessels, as well as lower EU ETS compliance costs.

To support implementation of the Company's decarbonisation transition plan and long-term GHG reduction targets, the Group aims that at least 70% of newbuilding capital expenditure through 2030 will be allocated to vessels capable of operating on lower-carbon and alternative fuels, including LNG and methanol.

Adoption of Life Cycle Assessment (LCA) – Following our Sustainable Ship Recycling Policy, we adopt the concepts of Life Cycle Assessment (LCA) in the strategic planning stage to minimise the environmental impacts when our vessels are being decommissioned. When planning our future newbuilding orders, LCA concepts have been incorporated into our container vessel designs to further enhance the environmental performance of our fleet. Other than relevant law and regulation compliance, when we sell our owned vessels for further trading, we provide buyers with approved IHM and encourage buyers to ensure and/or conduct responsible recycling.

Collaborative Decarbonisation Efforts – We recognise that stakeholder engagement and industry collaboration are critical to the successful implementation of its decarbonisation transition plan. Through active participation in industry initiatives such as the World Shipping Council and Clean Cargo, we work with industry peers to share best practices, support sector-wide decarbonisation efforts, and advance initiatives aimed at reducing GHG emissions across the maritime industry.

Participation in Environment-focused Organisations

To leverage collective efforts in tackling climate related challenges, the Company has established mechanisms and procedures governing participation in relevant memberships, trade associations and working groups, including internal review, approval and management oversight processes. We are a member of a few environment-focused organisations to actively address and demonstrate the support for environmental protection and mitigating climate change. Under these platforms and channels, we exchange ideas with other stakeholders on climate issues such as Paris Agreement and call for support and action from the policy makers.

Within these organisations, we liaise and negotiate with other members and different parties to produce consensus approaches on climate change mitigation and other environmental issues. We try to ensure the directions of these consensus approaches align with our Company's direction. In case of mis-alignment, they should be more ambitious than our directions, as a motivation for us to improve continuously. We regularly review and monitor the positions, advocacy activities and public statements of the organisations in which we participate to assess their alignment with our climate commitments and the objectives of the Paris Agreement. Where potential misalignment is identified, we engage with the relevant organisation to seek clarification and encourage alignment. The outcome of such engagement is considered in our review of continued participation in the relevant organisation or initiative, where appropriate.

World Shipping Council – The World Shipping Council (WSC) provides a platform for the liner shipping members to voice out and collaborate on actionable solutions for some of the world's most challenging transportation issues such as those that the relate to the environment. As a member company, we strive to promote and develop sound environmental solutions through the development of sustainable new international public policies and regulations to reduce air emissions and mitigate climate change. The WSC routinely works with a broad range of stakeholders from the public and private sectors to advance together in such areas.

As a WSC member, reference to the identified six critical pathways to zero-carbon shipping can help achieve the decarbonisation targets. The pathways include "Global Carbon Price", "New Building Standards", "Fuel Life Cycle", "Fuel Supply Development", "Green Corridors", and "R&D Investment".

Clean Cargo and Global Logistics Emissions Council under Smart Freight Centre – Smart Freight Centre (SFC) is an international non-profit organisation focused on reducing GHG emissions from freight transportation. Its goal is to guide the global logistics industry, through collaboration with global partners, towards the reduction of the industry's GHG emissions by one billion tons by 2030 and to reach zero emissions by 2050. Being a member in SFC can access and contribute to several industry-oriented programs, including Global Logistics Emissions Council (GLEC), Clean Cargo, and other decarbonisation initiatives. OOCL is proud to be a member of Clean Cargo and GLEC under SFC.

Clean Cargo is a collaborative partnership between ocean container carriers, freight forwarders, and cargo owners, aiming to generate high quality, decision-useful containership GHG emissions performance data for members and to serve as a forum for container transportation decarbonisation best practice sharing amongst members. The Clean Cargo methods are consistent with the GLEC Framework. Clean Cargo and GLEC members work together to provide multinationals and their suppliers with a harmonised, efficient and transparent way to calculate and report logistics emissions.

OOCL was a member of the Clean Cargo Working Group (CCWG) from 2003. Following Clean Cargo's transition into SFC, we support SFC's goal to guide the global logistics industry to reach zero emissions by 2050 or earlier, consistent with a 1.5°C future.

Business Environment Council – The Business Environment Council (BEC) is a non-profit organisation promoting corporate social and environmental responsibility. Members share their responsible business practices which balance economic, social and environmental interests.

Target Review

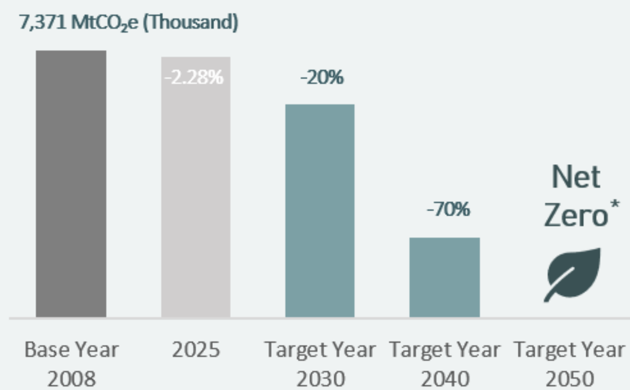
Under the ESG Reporting Mechanism carried out by the ESG Working Team, a series of environmental targets was launched in 2023 and is under regular review.

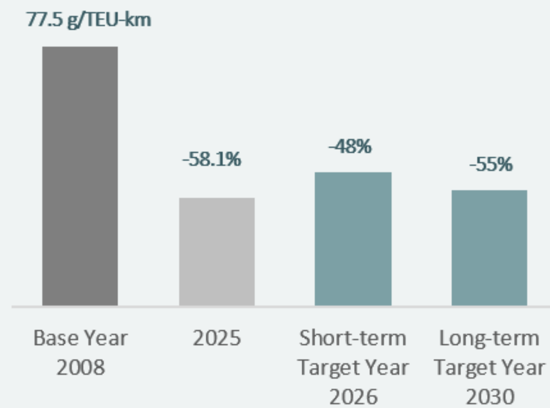
Progress

Direct GHG (Scope 1) Absolute Emissions & Intensity Reduction

|O|

- Our direct GHG emissions from owned vessels' operations accounts for over 99% of the Group's total Scope 1 & 2 GHG emissions profile.
- We are aligning with IMO GHG Strategy and is committed to **reaching net zero by 2050**. We have also set the indicative checkpoints in 2030 and 2040 with target of **at least 20%, striving for 30%**, and **at least 70%, striving for 80%** GHG reduction respectively, compared to 2008.
- In addition to OOCL's consistent efforts in improving energy efficiency in our operations over the years, we have invested in dual fuel green vessels and have been proactively exploring the development of cleaner alternative fuel, especially green methanol, to achieve the goal of Net Zero by 2050.





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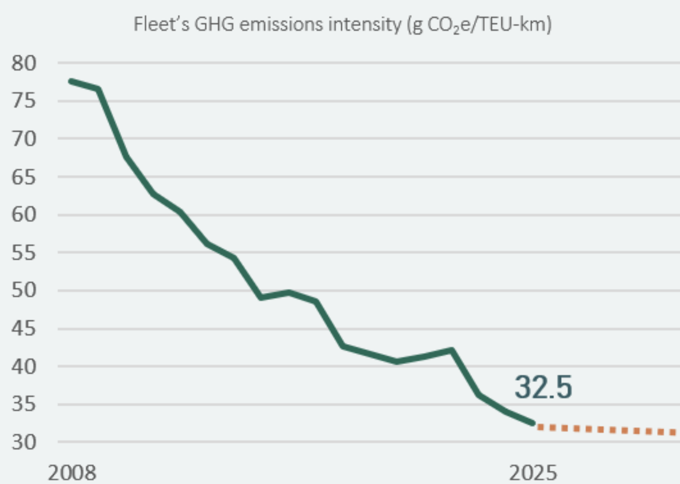
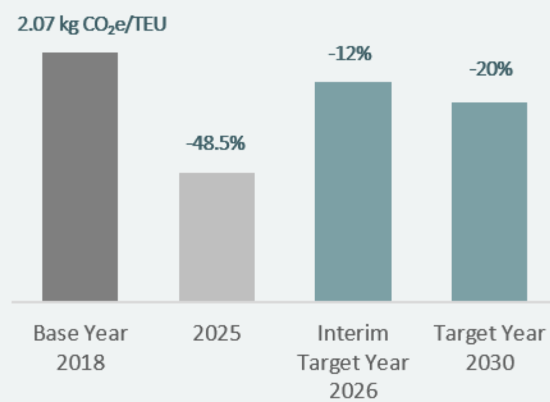
**Currently, our net zero target only covers to our scope 1 vessel GHG emission, which comprises the majority of our overall carbon footprint.*



Indirect GHG (Scope 2) Emissions Intensity Reduction

Our indirect GHG emissions from onshore liner operations accounts for around 0.14% of the Group's total GHG emissions profile, with the remainder mainly coming from the combustion of marine fuel by our owned and chartered-in vessels.



|O|

|✓| Achieved |O| In Progress

Target Review

Under the ESG Reporting Mechanism carried out by the ESG Working Team, a series of environmental targets was launched in 2023 and is under regular review.

Progress

Other Environmental Protection Measures

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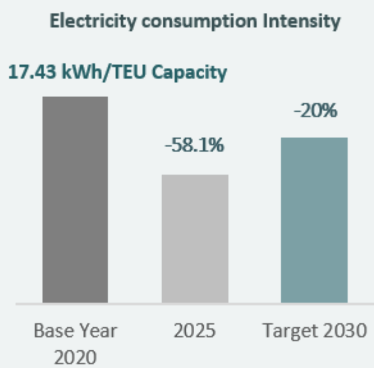
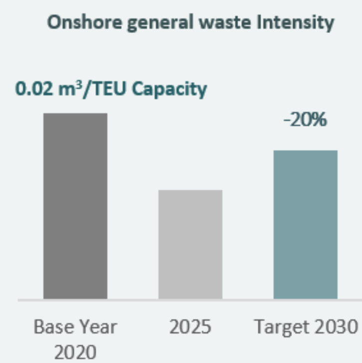
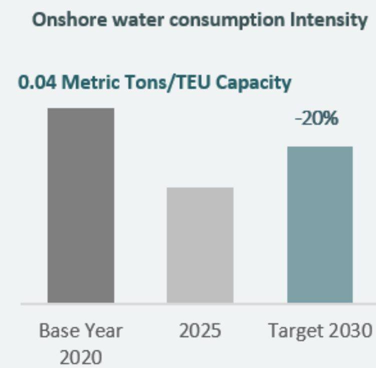
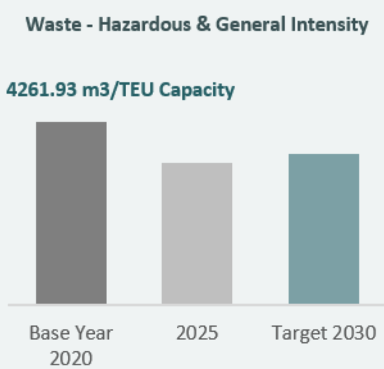
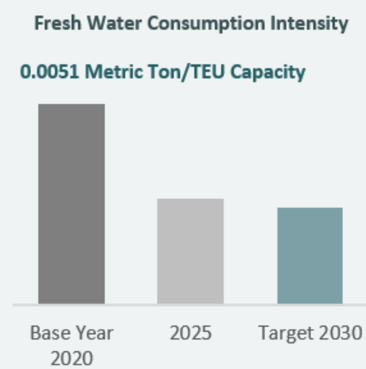
- Our Group has set out policies to minimise potential impacts of operational activities on the environment and the natural resources and use resources efficiently, including energy, water and other raw materials. We continue focusing on green investment which includes fuel-efficient vessels, and eco-friendly machineries and equipment. Each regional office of our Group has their own local recycling initiatives
- At sea, we apply the onboard waste management system and deploy appropriate waste handling facilities to meets our reduction objective; At port, we dispose non-hazardous and general wastes to facilities that are authorised by the local authorities
- We continuously monitor and reduce the amount of sludge being generated by each vessel by using specialised equipment, such as homogenisers and oil purifiers, to minimise the development of sludge
- We participate in voluntary speed reduction programmes in whale habitat areas identified by the World Shipping Council Whale Chart, aiming to reduce air pollution, underwater noise, and the risk of fatal ship strikes on whales, while also improving air quality and human health outcomes

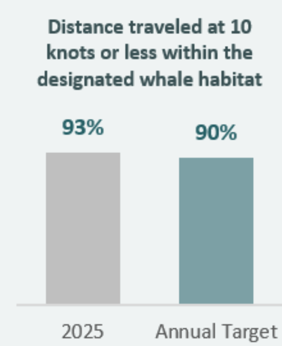












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|✓| Achieved |O| In Progress

Our People

The Group understands that the highest standards of business ethics begin with the treatment of its employees. The Group appreciates that its success, growth and performance are attributable to the skills, dedication and teamwork of its employees. It regards people as its greatest asset and takes good care of them. In line with the Group's values, we manage to invest in our people and support our employees to achieve their full potential. Our people's success is the Group's success.

Corporate Culture – People, People, People and Take It Personally spirit – At OOCL, we believe our success is tied to the success of our people. People are our greatest asset and this is reflected in our first core value of "People, People, People." This shapes our learning culture, and guides us to respect, invest in, and recognise our people.

One key aspect of our culture is the Take it Personally (TIP) spirit, with which OOCL prides itself on going beyond normal job responsibilities to serve our customers both internally and externally. To recognise and appreciate our staff who embody the TIP spirit, we have established Global Recognition Awards. This programme is internal in nature and designed to acknowledge employees who take personal ownership and go the extra mile in their roles.

We offer comprehensive employee development programmes designed to support career growth and personal advancement. Key initiatives include leadership development programme, diversity and cultural education as well as digital transformation programme. All applicable employees, including contractual and part-time colleagues, are encouraged to participate in these programmes to foster continuous learning and enhance workforce resilience in a rapidly changing business environment.

Collaborative Learning and Knowledge Sharing – WeLearn serves as our centralised learning platform and one-stop hub for learning and development. The platform offers a wide range of learning resources covering business knowledge, industry trends, leadership, soft skills, compliance, digital capabilities and cultural education. Through these learning opportunities, employees can broaden their understanding of diverse cultural backgrounds, practices, and perspectives while benefiting from knowledge and best practices shared across different teams and functions. This approach supports continuous learning, collaboration, and professional development throughout the organisation.

Celebration of Culture and Diversity – The event is actively promoted to celebrate traditional culture while offering employees a creative outlet for self-expression and stress relief. This can nurture cultural appreciation and deliver positive impacts on mental and emotional well-being, reinforcing our commitment to an inclusive, supportive and vibrant workplace.

Talent Development – International Executive Development Program (IEDP) – For our executives worldwide, we run an International Executive Development Program (IEDP) designed for three levels of talents to assist them to progress into leadership roles. This unique global programme invites potential staff across regions to our Hong Kong headquarters for a 3- to 10-day training. Conducted mostly by our internal trainers, the IEDP offers comprehensive development opportunities and valuable knowledge, ranging from business-related outlooks, updates on the Company's directions and development, to leadership skills to help these potential leaders thrive.

IT Solutions and Digital Workplace Tools Learning Series – To keep pace with the continuous evolution of IT solutions and the growing use of AI-powered workplace tools, OOCL provides learning opportunities to help employees enhance their digital capabilities, with a focus on capabilities that help plan, execute and complete tasks to improve productivity in the digital workplace. The programme covers AI applications in the workplace, including practical use cases to enhance productivity, efficiency and decision-making, as well as responsible AI usage and governance, including AI-related risks, data protection requirements, regulatory compliance and employee responsibilities when using AI tools. Participants gained valuable insights into industry best practices, broadened their perspectives on utilising AI, and strengthened the skills and knowledge required to navigate digital transformation and evolving workplace technologies.

Human & Labour Rights

Human and Labour Rights are an important element to our Corporate HR Guidepolicies in which it serves as a guideline to ensure compliance with all local, national and international legal standards. In particular, we respect the provisions of the Declaration, Compact and Principles from the United Nations in respect to human and labour rights # and the Conventions of the International Labour Organization.

Our labour policy reflects a strong commitment to fair and responsible employment practices. We ensure payment of a living wage and uphold equal remuneration for men and women. The policy sets clear limits on maximum working hours and aims to avoid or reduce overtime and excessive workloads by ensuring adequate rest hours for our seafarers. All employees are entitled to enjoy paid annual leave and equal remuneration. In the event of mass terminations, appropriate minimum consultation and notice periods could be considered and adopted through transparent processes implemented in advance. These measures demonstrate our dedication to protecting workers' rights and fostering an equitable workplace that aligns with international labor standards and ethical business principles.

We expect our business partners throughout the value chain to respect and uphold labour practices that are aligned with the principles and standards outlined in this policy, and we encourage them to continuously promote fair, safe, and responsible working conditions within their own operations and supply chains.

We have taken actions/programmes with regards to:

- Elimination of all forms of forced, compulsory and child labour
- Freedom of employment & association
- Respect for the individual and elimination of discrimination
- Safe and healthy working conditions
- Payment of living wages and regular employment entitlements
- Non-excessive working hours
- Prevention of human trafficking
- Promotion of equal remuneration
- Respect for the right of collective bargaining

Other chapters, such as, "Code of Conduct", "Equal Opportunity in Employment", "Prohibition of Harassment" and "Grievance Handling Process" are also incorporated in the Corporate HR Guidepolicies and communicated to our employees through new-hire orientation, training and Group's intranet.

We invited various stakeholder groups to complete a stakeholder engagement survey to access all possible human and labour rights issues in our business activities. The results showed that the risk and impact from this assessment area were relatively not significant in our stakeholders' perspective. Please refer to the Materiality Matrix for more details.

We have not received any reports on non-compliance, violations or grievance related to human and labour rights issues in the reporting year. In our approach to protecting the right of our people, we periodically monitor and review our employment practices to safeguard the best interests of our people. Meanwhile, our employees or employee representatives can anonymously report any human and labour rights issues to the company management through a formal grievance handling process. It allows us to investigate the findings of the reported incidents, and to perform remedial actions following the reported incidents in a timely manner. These mechanisms help us ensure that we continue to be in full compliance with the related laws and regulations in order to maintain 'zero incidents'. We constantly monitor and assess if there are any human and labour rights impact or risk to any of our existing, new and/or potential operations or projects (including activities across our value chain and joint ventures). If a risk has been identified, the Operational Risk Management process will be implemented company-wide for risk mitigation. The Operational Risk Management process is reported on a quarterly basis through the SSE Committee.

Human & labour rights on board are regulated by mandatory regulations of IMO, Administration and Safety, Quality and Environmental (SQE) Management System. Moreover, relevant significant changes in regulatory requirements or major concerns would be addressed by SSE Committee. In terms of day-to-day vessel operations, Ship Masters are responsible to manage and oversee these issues to ensure respect of human & labour rights.

For example: The UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights from The UN Global Compact.

Modern Slavery Act Transparency Statement – Modern slavery is defined as "slavery, servitude, and forced or compulsory labour" as well as "human trafficking". We are absolutely committed to ensuring that modern slavery in any form has no place in our business and supply chain through active participation in the Group's global policies, many of which are relevant to modern slavery and human rights. We expect our suppliers and contractors to operate fair and ethical workplaces and practices, where workers are treated with dignity and respect, and the standards of human rights are upheld.

Our Modern Slavery Act Transparency Statement endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Anti-Harassment Policy – A chapter of the Global HR Policies & Guidelines is designated to define harassment and formulate the Company's zero-tolerance policies on prohibition of harassment in the workplace. As the summary of the Policy:

- In the event that any sort of ethical, racial, religious, or sexual harassment, or similarly abusive verbal or physical conduct creates an intimidating, hostile or offensive work environment, the Company urges employees to contact their supervisor or the Regional Human Resources Department
- The colleagues' supervisor or the Regional Human Resources Department will serve as an escalation channel and the reported incidents will be handled with the highest possible degree of confidentiality
- If the Company determines that harassment has occurred, disciplinary action against the harassers, up to and including dismal, will follow

Equal Opportunity and Anti-discrimination – We are committed to equal opportunity in recruitment and employment. The Group would like to encourage and retain the diversity of employees in all the locations it operates to offer local employees fair promotion opportunities and benefit from the diversity of thought. It is the Group's policy not to discriminate against any employee or applicant for recruitment and employment on the grounds of nationality, race, colour, religion, creed, age, sex, disability, pregnancy, childbirth and related marital status, sexual orientation, veteran status and any other category as guided by local laws and regulations. We have also taken action to manage and improve workforce diversity and avoid various discrimination. We strive for maintaining such gender balance among our workforce. In case of redundancy, voluntary or involuntary, the Group has established proper procedures so as to ensure that there is no discrimination and to remove any effects which could be disproportionate and unjustifiable.

Equal Remuneration, Fringes Benefits and Compensation – Our employee salary and benefits are maintained at competitive levels, guaranteeing that all personnel receive adequate remuneration that stands well beyond minimum living wage benchmarks. All employees are paid fairly and equitably in terms of total remuneration based on the principles of internal equity with reference to job sizes and accountabilities, and external competitiveness with reference to comparable companies in the industry. To effectively attract, motivate and retain quality employees in support of the achievement of our business objectives, we conduct regular reviews of our remuneration structure, compensation packages and benefit offerings to ensure continued competitiveness and alignment with market conditions. Gender pay ratio is regularly monitored to ensure fairness in workplace. During the reporting period, we are not aware of any significant gender pay gaps across all employees upon review.

Employees are rewarded on a performance related basis within the general policy and framework on the Group's salary and bonus schemes which are regularly reviewed. For promotion, the Group assesses all possible candidates and ensures that nobody with potential has been overlooked.

Human and labour rights, safe and healthy working conditions and non-excessive working hours are provided. As part of our corporate labour practices and under the guidepolicy of "Employment Terms and Conditions", benefits and compensation includes but are not limited to: Rest Periods, Holidays and Leave Entitlement, and Contribution Scheme. Other welfare and benefits include medical insurance and pension funds to ensure our employees are well taken care of. During the reporting period, we are not aware of any incidents of human rights violations, discrimination and labour rights issues. The Group fully complies with relevant standards, rules and regulations on compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare.

Human Rights Due Diligence for Seafarers – Human Rights Due Diligence (HRDD) plays a crucial role in our recruitment and crew engagement processes to identify and mitigate human rights risks while supporting the standards outlined in the International Labour Organization's Maritime Labour Convention, 2006 (MLC, 2006). The MLC, 2006 mandates that all ratifying members protect the rights of seafarers, including the right to freedom of association, the right to collective bargaining, and the provision of decent working and living conditions on board vessels. Additionally, it requires access to onboard medical care, food, and catering services. The convention also calls for the elimination of all forms of forced labour, child labour, and discrimination in employment and occupation.

As proof of compliance with the MLC, 2006, all our vessels operating on international voyages carry Maritime Labour Certificates and Declaration of Maritime Labour Compliance (DMLC). Other than the focus areas above, during the recruitment and crew engagement process, our regular HRDD ensures equal opportunity for candidates and equal remuneration for respective ranks of crews, which also helps us to review and identify the potential issues and risks from existing and new activities where applicable. Collective bargaining agreements (CBAs), established between the Company and recognised seafarer unions, provide a formal mechanism through which employee representatives engage on matters relating to working conditions, remuneration, benefits and other employment-related issues. The CBAs are reviewed and reaffirmed annually to ensure their continued relevance and alignment with applicable labour requirements and industry practices. Candidates are well informed of their rights, as well as potential remuneration, benefits, roles and responsibilities should they become part of the crew.

Decent Working Conditions – We are committed to managing fatigue risks by enforcing non-excessive working hours and guaranteeing adequate hours of rest in accordance with the DMLC. Working hours, including overtime hours, are regularly monitored and recorded to ensure compliance with applicable maritime labour requirements and to support effective fatigue risk management. We also ensure that seafarers are compensated in accordance with applicable employment agreements, collective bargaining agreements and relevant labour regulations, including payment or compensation for overtime work where applicable. Paid annual leave entitlements are administered through established crew management processes to ensure seafarers receive and utilise their entitled leave for rest and recovery. In addition, our onboard E-learning programme educates seafarers on managing fatigue and stress at sea, promoting a safe, healthy and compliant working environment.

Psychological Wellbeing in the Workplace – MedSea has been appointed to provide fleetwide medical advisory support. A dedicated tool, The Mariners Medico Guide, has been introduced across all vessels, offering comprehensive medical guidance for seafarers, including consultations on physical health and mental wellbeing. Training on mental health and wellbeing is also provided, equipping seafarers with the knowledge to manage stress and psychological challenges at sea.

Drug and Alcohol Prevention and Management – The abuse of drugs and alcohol is strictly prohibited under our Shipboard Management Guideline. We enforce a strict zero-tolerance policy on substance abuse. Any seafarer who is, or is suspected to be, under the influence of alcohol or drugs is prohibited from performing duties onboard. Regular health check-ups, systematic alcohol and drug testing, and ongoing awareness training are conducted to safeguard the well-being of our seafarers. Relevant health and testing results are reviewed to ensure seafarers are fit for duty. Seafarers are encouraged to proactively report any potential drug or alcohol consumption, and appropriate medical support or health consultations are provided where required. Any confirmed violations related to substance abuse, including alcohol levels exceeding permitted limits, are subject to disciplinary action, which may include dismissal, in accordance with company policy and safety standards.

Environmental Awareness and Training – All OOCL senior officers on ships are professionally trained to acknowledge the importance of environmental protection and abide to the Company's policy and procedures, such as the Ballast Management Plan, Garbage Management Plan Shipboard Marine Pollution Emergency Plan and Ship Energy Efficiency Management Plan, to protect the environment. Subsequently, all other OOCL crew members are then trained by their senior officers. Besides, all OOCL employees mandatorily undertake basic training on environmental awareness through learning the Company's core values within the first few weeks on the job. In addition, OOCL provides ongoing training and skills development opportunities to equip employees and sea staff with the knowledge and competencies required to support the maritime industry's transition towards decarbonisation, including compliance with evolving environmental regulations, operational requirements and sustainability standards.

Through these trainings, our sea staff and employees are equipped with knowledge on how to enhance energy efficiency, reduce unnecessary water usage and avoid waste disposal.

Grievance Handling Process – The guidepolicy of Grievance Handling Process is in place to define and formulate the framework for handling grievances raised by employees and ensure that all such matters can be resolved in a fair, consistent and expeditious manner and in strict confidence. Any complaint or grievances will be promptly and thoroughly investigated by the immediate supervisor or Corporate Human Resources or any other person as appointed by the Company. The investigation will be communicated with relevant employees through channels deemed appropriate by the Company determines that a complaint is founded or grievance has occurred, appropriate relief for the employee bringing the complaint or grievance and appropriate disciplinary action against the source of complaint or grievance will follow. Complaint or grievance matters can be extremely sensitive and as such, all communications such as interviews and witness statements will be kept confidential.

The Company will strive to ensure that there will be no retaliation or adverse action taken against the employee who raised the complaint or grievance by providing information in confidence. The Corporate Human Resources is actively involved in the consultation and resolution process to ensure a proper settlement.

In line with the Company's core value on People, People, People, which takes into consideration of equal opportunity, respect and dignity of all employees in a supportive environment, this guidepolicy is to define and formulate the framework for handling workplace grievances raised by employees to ensure that all such matters can be resolved in a fair, consistent and expeditious manner and in strict confidence.

As a defined escalation process, any complaint or grievance over inequitable treatment, procedural unfairness and infringement of Human and Labour Rights including any form of harassment and discrimination (linked to Code of Conduct) in the workplace will be promptly and thoroughly investigated by the immediate supervisor or Regional HRA Department, or any other person as appointed by the Company if independent investigation and/or arbitration is necessary and appropriate. If required or deemed necessary, further trainings will be provided to supervisors on how to handle colleagues' reports of workplace harassment. The result of such an investigation and/or arbitration will be communicated through channels deemed as appropriate by the Company to the employee. If employees feel particularly vulnerable, grievances can be lodged anonymously.

Not only do we handle grievance internally, our grievance handling process also applies to external s. Through the engagement exercise, we can handle any grievance issues that may arise from the community. We invite our s to complete a survey annually to review whether our business activities play a vital role to the communities where we operate. The survey explicitly covers human rights issues and all the data we collect are kept confidential and anonymous. In addition, the general public can offer us feedback and comments regarding our business activities through our corporate website.

Code of Conduct – In the interest of adhering to the highest ethical standards on an ongoing basis, the Group has a formulated Code of Conduct which serves as a guideline to ensure compliance with all local, national and international legal standards and to preclude offences under local, national and international laws, any breaches of confidentiality, non-disclosure requirements or intellectual property rights and any conflicts of interest, acts of bribery, corruption or political contribution and any other areas of deemed misconduct.

To ensure effective implementation of our code of conduct, the Group's policy assigns appropriate responsibilities and reporting lines to employees. We have set up procedures to identify, manage and control risks that may have an impact on the business of the Group. The Group's "Whistle Blower Policy" is one of our formalised procedures through which employees can anonymously file reports or register concerns and helps govern the reporting and thorough investigation of allegations of suspected improper activities.

Disciplinary Action – The guidepolicy of Disciplinary Action defines and formulates a system of progressive disciplinary actions on instances of non-compliance by employees who have repeatedly failed to meet conditions of employment. Our policy ensures that when administering disciplinary actions, there is strict observance and adherence to established procedures so as to maintain fairness and consideration and to minimise any potential disruption to our operation. All employees should observe standards of job performance and professional conduct as specified in Code of Conduct, Employee Handbook, Personal Data Protection and Privacy, Anti-Harassment Policy, Equal Opportunity and Anti-Discrimination Policy and other local Human Resources policies. For first time offenders, the Company will endeavour to provide employees with necessary guidance and opportunity for correction. However, if the employee fails to improve, he/she may be subject to disciplinary action and in cases of serious misconduct, be subject to summary dismissal.

Security

The Group maintains vigilance to prevent any potential threats to security. Security measures, plans and standards are all in place and audited at every level of our organisation. We take every precaution to provide the highest levels of security for our customers and employees. In a world where cargo security are becoming more complex in the international trading community, OOCL places strong emphasis on the security of our operations against possible compromise and to the maintenance of the highest level of compliance in security related areas.

Information Security

The Company's information security and cyber security risks, which are grouped under IT risk as registered on the functional risk dashboard. These risks are safeguarded by the Information Services Department, which is led by Chief Information Officer, a member of the executive committee of OOCL, to oversee a full spectrum of IT-related and cyber security strategies of the Group. IT security risks have been identified as material issues for both internal and external stakeholders. Our Security Threat Monitor Center operates 24/7 to track and record the number of actual or suspected information security breaches. This metric serves as a critical indicator for assessing our cybersecurity performance and effectiveness, enabling us to proactively prevent severe incidents and measure progress against established security objectives. We adopt a zero-tolerance approach to all types of severe cyber security incidents to protect all our business activities from being suspended or disrupted due to relevant risks to secure and drive our long-term values. Significant risk events identified under our cyber security strategy would be incorporated into the Group's risk register for the review of management, the Risk Committee and the Board as necessary. We did not experience any breaches of information security, such as receiving complaints concerning breaches of customer privacy, or other cyber security incidents over the past three years.

The Company has established an Information Security Policy/Manual to ensure the robustness and resilience of our security systems. The framework supports the integrity and protection of all data through proactive monitoring and response to emerging threats and ongoing improvement of our security systems. Individual accountability is reinforced through clearly defined information security responsibilities across the organisation. Additionally, we uphold stringent information security requirements across our value chain to ensure that our standards are consistently met throughout our extended network and third parties, including suppliers and service providers. Internal audits are conducted at planned intervals to evaluate the reliability and effectiveness of the Group's IT systems and information security controls, and compliance with the Group's information security and privacy policies, in accordance with the requirements of our Information Security Management System and ISO 27001.

Responsible AI Usage and Governance

Artificial Intelligence (AI) is rapidly becoming an integral part of the modern workplace, transforming the way we work, collaborate and make decisions. As AI technologies continue to evolve and become increasingly accessible, the Group recognises their potential to enhance productivity, efficiency and innovation across different business functions. To support the responsible adoption of AI, we will launch our first Global AI Training Programme for all employees, with the aim of building AI literacy across the organisation and helping employees better understand AI technologies and their practical applications in the workplace. We believe AI is no longer a technology reserved for IT professionals, but an increasingly important skill that can support employees in performing their day-to-day responsibilities more effectively. The Group is committed to promoting the responsible and ethical application of emerging AI technologies. The principles established under our Information Security and Privacy policies, which are endorsed and reviewed by Management, are extended to cover the responsible use of Artificial Intelligence and support the secure, transparent and accountable adoption of AI across our operations.

Data Protection & Privacy

Personal Data Protection and Privacy – Embedded in the group-wide compliance management, our Personal Data Protection and Privacy Policy outlines how personal data of employees should be processed in compliance with the General Data Protection Regulation ("GDPR") and other applicable data protection law relevant in those jurisdictions where personal data of individuals is processed. The data protection obligations for employees when handling vendors' and customers' personal data are also provided in the policy. In the event of a suspected personal data breach, each employee must inform the Local Privacy Officer in the Regional Office immediately to further contact the Privacy Compliance Team. The Privacy Compliance Team will escalate this to the Group Privacy Officer, who shall take all appropriate measures. We recognise the importance of protecting personal and confidential information when using AI technologies. Employees are required to comply with the Group's Information Security and Privacy policies when using AI tools, ensuring that personal data and sensitive business information are handled responsibly and in accordance with applicable legal and regulatory requirements.

Office Data Protection Framework – To further strengthen our risk awareness and data protection, the Company launched an Office Data Protection Framework (ODPF). All business documents and emails are classified into four categories based on their level of sensitivity, namely Secret, Confidential, Restricted and Public, to enhance data privacy and cyber security in daily operations.

Data Privacy and Intellectual Property Rights – We have attained the ISO 27001 Information Security Certification and evaluated our information security management system to protect our customer and business data privacy from cyber risks. Our Privacy and Security Statement sets out how we collect, use, store and protect the personal data and information. We ensure our business activities comply with EU General Data Protection Regulation (GDPR) and other applicable data protection law relevant in those jurisdictions when we process personal data of individuals. All personal data are strictly encrypted and only accessible by authorised personnel within the Company.

The Group's Code of Conduct ensures intellectual property rights are observed and protected. This policy assures that the Company's business and customer information are well protected and that there is no misappropriation of our intellectual property.

Information Security Management System Certification

OOCL continues the compliance to the latest ISO/IEC 27001:2022 standard in 2025 that puts more focus on managing and improving processes within an organisation's Information Security Management System (ISMS) and meets the high corporate IT security management, planning and control standards. The ISO/IEC 27001 Information Security Certification is an internationally-recognised code of practice for the management and protection of information security and recognises that our data centre is professionally secured to world-class standards. The importance of information security is to ensure that timely and accurate information is available when delivering products and services while at the same time, preventing and minimising security incidents.

The certification covers the primary production Data Centre, also extends to secondary Data Centres for "Research and Development" and "Disaster Recovery" services, as well as to our Bimodal Innovation Center for both "Production" and "Research and Development" purposes. The latest ISO/IEC 27001 standard keeps the last edition's all the Information Security objectives and controls and extends to Cybersecurity and Privacy Protection. These new controls include Threat Intelligence, Information Security for Use of Cloud Services, ICT Readiness for Business Continuity, Physical Security Monitoring, Configuration Management, Information Deletion, Data Masking, Data Leakage Prevention, Monitoring Activities, and Web Filtering.

Certification for IQAX's Logistics Solutions – IQAX continues to demonstrate commitment to information security by maintaining its ISO/IEC 27001 certification for all IQAX products and extending to achieve cybersecurity compliance with Multi-Level Protection Scheme (MLPS) at Level 3 for eBL product in China. This has underscored the alignment of IQAX's products with best practices and the most up-to-date security measures to keep data safe and private for users. The certification ensures the increased reliability and security of systems and information, engenders confidence among customers and business partners, strengthens the resilience of the business, aligns IQAX with the requirements of customers, and allows for improved management processes and better integration with corporate risk strategies.

Cyber Security Management

Security Threat Monitor Center – The Security Threat Monitor Center (STMC) offers continuous, round-the-clock monitoring of the Company's security posture. It specialises in detecting security threats, providing timely responses, and remediating potential security risks. The autonomous Security Operation Center (SOC) platform integrates Large Language Model based AI Agents to enhance and streamline cybersecurity operations. These operations include alert triage, augmented threat intelligence investigation, incident summarisation, automated remediation, and report generation. There are multiple dashboards monitoring the global cyber security threat, including a global map showing the real-time network connectivity status and offices with security threats detected and being mitigated. The overall cyber security posture and risk score measure the current corporate cyber security posture. Real-time attack sources/destinations, attack types and counts provide additional insight in case need to drill down to a particular security threat. We seek to ensure that AI technologies adopted by the Group are subject to appropriate cybersecurity safeguards and controls. AI-related applications and services are expected to align with the Group's information security requirements to protect systems, data and business operations from potential cyber threats and unauthorised access.

Defence in Depth – Multi-layered security, including physical security, network firewall, intrusion prevention, network access control, network detection & response, micro-segmentation, web application firewall, database firewall, anti-DDoS, data encryption, anti-phishing and anti-malware email gateway, endpoint detection and response, deception technology, privilege access and secret management, secures the Company's IT assets comprehensively. This strategy uses multiple diverse controls to maintain a resilient security posture.

Human Oversight and Responsible Use – We are committed to the responsible use of AI technologies and recognises that the importance of avoiding potential inaccuracies, unintended bias or incomplete information. AI is intended to assist employees in performing their work and does not replace human judgement or accountability. Employees are expected to exercise professional judgement when reviewing AI-generated outputs and assess whether the information is appropriate, objective and suitable for the intended business purpose. Appropriate human oversight is maintained for material business activities to ensure that decisions remain subject to review, validation and intervention by responsible personnel where necessary. AI-generated outputs should be subject to regular review and validation to identify potential inaccuracies, bias or unintended outcomes. Material business decisions remain subject to human review and intervention, and concerns regarding the use or outcomes of AI may be raised through established management, compliance or grievance handling channels where appropriate.

Appropriate Use of AI – The Group establishes clear expectations regarding the appropriate use of AI technologies. Access to certain AI technologies and capabilities may be restricted based on business needs, risk considerations and applicable legal or regulatory requirements. Employees must use approved AI tools in accordance with business needs and applicable policies, while exercising professional judgement when reviewing AI-generated outputs. Confidential, personal or other sensitive information should be protected when using AI tools, and AI-assisted content should be verified before use. Where appropriate, employees are encouraged to disclose the use of AI in content creation, maintain appropriate records of significant AI-assisted decisions and seek guidance from relevant functions when uncertainties arise. Employees must not rely solely on AI for decisions that may materially affect individuals, and any inaccurate, inappropriate or potentially biased outputs should be reviewed and addressed through appropriate channels.

Mobile Threat Defense – As part of our plan to enhance cyber security, the Company implemented a Mobile Threat Defense (MTD) solution to strengthen data security and reduce the risk to cyber-attacks on mobile devices. The solution has been implemented in all Company-owned mobile devices and personal devices used for accessing sensitive business information.

Vulnerability Assessment & Simulated Cyberattack – Regular vulnerability assessments are conducted to identify potential security risks for early mitigation. Additionally, penetration testing and simulated cyberattacks are performed by a third-party security service provider with appropriate certification at least once a year. The purpose of penetration testing is to uncover any potential security weaknesses or misconfigurations in applications, systems, and network infrastructure that could pose a security risk. The simulated cyberattack, on the other hand, serves as a practical test of our cyber security defences, assessing their ability to detect and prevent penetration attempts. These regular assessments are crucial in mitigating potential security risks and ensuring the robustness of our security posture and the integrity of our digital assets.

Awareness & Training

Cyber Security Awareness Training – Traditionally, antivirus and malware detection software would provide a boost to our computer security by helping our computers stay away from being “infected”. But as the development of the Internet is becoming more sophisticated than ever, signature-based virus/malware detection tools alone are no longer sufficient today. This is because the “Advanced Persistent Threat”, a set of stealthy and continuous computer hacking processes often orchestrated by attackers targeting a specific entity by taking advantage of security loopholes, is growing. APT has been observed to target organisations and/or nations for business, financial and/or political motives. “Corporate Security Breaches”, “Email Spoofing”, “Spear Phishing” and “Social Media Fraud” are some of the common types of cyber attacks.

A user awareness training program has been developed to increase employees' knowledge and awareness of cybersecurity. This includes an annual cybersecurity awareness training with a mandatory test for all employees and a phishing email testing exercise. This global cybersecurity awareness training programme reflects our commitment to IT security and best practices to protect company and customer information.

A Cyber Security Awareness Refresher course was launched in April 2025 for our global staff. The course was designed to help users at all levels to refresh their understanding and awareness of cyber security. The refresher course emphasised phishing email identification and security best practices in office document protection.

Phishing Email Awareness Exercise – Phishing emails are a significant cyberattack vector, making it crucial for OOCL staff to learn how to prevent these attacks and handle suspicious emails. OOCL has initiated an awareness exercise focused on phishing emails. Emails designed to mimic those from hackers were sent out to staff to evaluate their susceptibility to phishing and to assess our organisation’s vulnerability to actual attacks. Our staff are regularly educated and updated with the latest phishing tactics through multiple phishing email tests conducted annually.

Global AI Training Programme – To support the responsible adoption of AI technologies, we have launched our first Global AI Training Programme for all employees. The programme aims to build AI literacy across the organisation by enhancing employees’ understanding of AI technologies, their opportunities, limitations and associated risks. Training content covers the responsible, secure and ethical use of AI, including information security, data privacy, human oversight, governance considerations and applicable requirements for the use of AI tools in business operations. Through continuous learning and awareness building, we seek to equip employees with the knowledge and skills required to use AI technologies responsibly and effectively in their day-to-day work.

Global Shipping Business Network (GSBN)

The Global Shipping Business Network is an independent, not-for-profit technology consortium to build a blockchain-enabled operating system to redefine global trade. The platform facilitates trusted collaboration between market participants, as well as enabling greater efficiencies and resilience. It also aims to expand the global trade ecosystem by creating bridges to new market participants including banks, fintech companies and other consortia. GSBN supports the development of technology-driven innovation as the sector makes the leap to digital.

The consortium was first founded by eight leading ocean carriers and terminal operators, including OOCL, in the global shipping industry. IQAX was officially commissioned by the GSBN to develop, enhance, and operate the blockchain platform, which will enable real-time data sharing among authorised parties using blockchain technology for more transparent end-to-end supply chain visibility. As a trusted partner, IQAX works with GSBN and its future members to develop standards and functionalities to seamlessly connect stakeholders in the global shipping and trading ecosystem while ensuring data integrity, security and service excellence are maintained.

Accountability & Responsibility

Product and Service Responsibility – The Company is committed to honesty, integrity and fairness in everything it does. We support fair trade and operation practices; and ensure that our advertising, marketing and communications materials are appropriate, updated and in compliance with government regulations and industry best practices; and provide an appropriated and updated. Our guidepolicy on advertising is defined and formulated according to a framework to ensure that all advertising projects and related matters are in line with our fair trade and operation practice as well as in compliance with applicable government regulations and industry best practices. We also adhere to the principles set out in our Safety, Security and Environment (SSE) Policy which outlines our operating principles that employees can follow to maintain high standards of health and safety in the workplace in order to avoid any associated risks to the Company's business activities. We strictly comply with the requirements of relevant laws and regulations related to the product and services we provide to our stakeholders. Taking a zero-tolerance approach for all these areas, the Group is not aware of any material noncompliance with relevant laws and regulations on health and safety, advertising, information security, cyber security and privacy matters related to products and services provided during the reporting period. So there was no any redress action undertaken. Recall of products sold/shipped data, as well as its quality assurance process and recall procedures are not applicable to our industry as we do not manufacture or sell any physical products.

Transparency, Explainability and Accountability – We seek to ensure that AI technologies are used in a transparent and responsible manner. Employees are expected to understand the purpose, capabilities and limitations of AI tools and maintain sufficient oversight of AI-assisted outputs. AI-generated information should be reviewed for reasonableness and suitability before use, and users should be able to explain how such outputs have contributed to a business recommendation, analysis or decision where appropriate. Where appropriate, employees are encouraged to disclose the use of AI in content creation and communication to promote transparency and informed use of AI-generated information. The accountability for decisions and outcomes remains with the responsible employees and business functions. Any material errors, risks or concerns arising from the use of AI should be investigated and addressed through established governance and risk management processes. We recognise that AI technologies may evolve over time and periodically review the suitability, performance and associated risks of AI tools adopted for business use.

Sustainable AI Adoption – As part of our commitment to sustainable development, we seek to consider environmental factors, where practicable, when evaluating AI technologies and service providers. Consistent with our Sustainable Procurement Policy and supplier management approach, we encourage vendors, suppliers and business partners supporting AI-related products and services to align with our environmental, governance and responsible business expectations. Through the responsible adoption of AI solutions that support operational efficiency and effective resource utilisation, we aim to balance innovation with our broader sustainability objectives.

Ethical and Compliant Use of AI – AI technologies should be used in a manner that is responsible, trustworthy and compliant with applicable legal and ethical requirements. We stay informed of emerging AI-related laws, regulations and recognised frameworks, such as the European Union Artificial Intelligence Act (EU AI Act) and ISO/IEC 42001, and consider relevant principles and best practices when developing our governance approach for the responsible use of AI. AI systems must not be used for unlawful, unethical or inappropriate purposes, including manipulative practices, exploitation of vulnerabilities, unauthorised surveillance or other activities that are inconsistent with human rights principles, the Company's Code of Conduct, applicable regulations or responsible business practices.

Appendix: Additional Performance Data Summary

GRI Reference	Performance Indicators	Unit	Scale	2023	2024	2025
	Raw Materials Consumption					
	Mixed Wood	Metric Ton	Actual	2,268	60,570	49,350
GRI 305-1, 305-2, 305-3	**Greenhouse Gas Emissions (GHG)**					
	Carbon Dioxide (CO_2) - Direct	Metric Ton	Thousand	6,173.50	6,808.91	7,091.40
	Methane (CH_4) - Direct	$MtCO_2e$	Thousand	2.51	2.81	2.76
	Nitrous Oxide (N_2O) - Direct	$MtCO_2e$	Thousand	101.70	111.08	108.82
	Total Scope 1 Emissions	$MtCO_2e$	Thousand	6,277.70	6,922.80	7,202.98
	Total Scope 2 Emissions - Electricity Use	$MtCO_2e$	Thousand	12.20	11.34	12.77
	Total Scope 3 Emissions [i]	$MtCO_2e$	Thousand	2,688.83	7159.87	7,685.48
GRI 305-4	**Greenhouse Gas Emissions (GHG) Intensity**					
	GHG Intensity - Fuel Use	g CO_2e/TEU-km	Actual	36.2	34.0	32.5
	GHG Intensity - Electricity Use	g CO_2e/TEU	Actual	1,661.99	1,500.58	1,622.27
-	**Financial Implications on Environmental Impact Mitigation**					
	Costs of Mitigating Environmental Impacts [ii]	USD	Million	230.52	110.62	306.55
	Amount Invested on Pollution Control [iii]	USD	Million	37.94	33.88	13.78
	Internal Carbon Pricing [iv]	EUR/TEU	Actual	56.17	60.29	65.94
	Biodiversity					
	Protecting Whales Programs Participated	#	Actual	3	3	3
	Distance Traveled at Slow Speed within the Designated Zones [v]	%	Actual	Above 95%	Above 91%	Above 93%
	Business Ethics & Standards					
	Percentage of Operation Sites with ISO 27001	%	Actual	100%	100%	100%
	Incidents of Privacy Breach and Cybersecurity	#	Actual	0	0	0
GRI 2-7, 2-8, 403-9	**Health and Safety**					
	No. of Employees - Shore Staff	FTE	Actual	8,724	8,553	8,724
	No. of Employees - Sea Staff	FTE	Actual	2,723	2,670	2,941
	No. of Cases with the Actual Lost-time Injury - Shore Staff	#	Actual	12	9	7
	No. of Cases with the Actual Lost-time Injury - Sea Staff	#	Actual	0	0	1
	No. of Cases with the Actual Lost-time Injury - Contractors	#	Actual	0	0	0
	Lost-Time Injury Frequency Rate [vi] - Staff	#	Actual	0.50	0.39	0.49
	Lost-Time Injury Frequency Rate - Contractor	#	Actual	0	0	0

Note:

i. The Group completed the mapping of our major of Scope 3 from relevant upstream or downstream activities along value chain and expanded its inventory-taking of Scope 3 emissions by referencing the GHG Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The remaining nine categories are excluded as (1) they are not applicable to the Group's business activities, (2) they are expected to be insignificant within the Group's GHG emissions profile, (3) the Group has limited potential to influence GHG reductions for these categories, or (4) limited ability to collect complete, accurate, and consistent data at this stage. The Group's value chain emissions profile is subject to review and updates. Therefore, there is a significant increase in both Scope 3 emissions and the Group's total GHG emissions.

ii. The costs of mitigating environmental impacts consider the average bunker cost difference between Heavy Fuel Oil (HFO) and Very Low Sulphur Fuel Oil (VLSFO), together with the bunker amount switched to VLSFO to reduce SOx emissions.

iii. Investment amount for pollution control covers our retrofitting projects on vessels, such as installing scrubber and ballast water treatment systems on board. We are working with shipyards and makers on the research and development of these retrofitting projects as well as the methanol retrofitting for vessels' main engines.

iv. The internal carbon price focuses on Scope 1 GHG emissions from vessel operations and serves as a shadow carbon price in evaluating the potential financial implications of carbon emissions. It is used to integrate climate-related considerations into risk assessment and investment decision-making processes, support the implementation of climate-related agenda and enhance preparedness for evolving carbon-related regulatory requirements. Actual carbon compliance costs remain subject to prevailing carbon allowance prices at the time of trading.

v. During the reporting season, the reduced transit speeds of participating vessels resulted in a 40% reduction in whale strike risk and a 70% reduction in acoustic intensity from participating vessels. These impacts were estimated by the Protecting Blue Whales and Blue Skies Vessel Speed Reduction Program based on the performance of participating vessels during the reporting season, relative to a 2016 baseline of vessel transits within the programme area.

vi. Lost-Time Injury Frequency Rate represents lost time injuries per 1,000,000 hours worked. The underlying data are derived from the same dataset disclosed in our Sustainability Report in accordance with GRI 2-7, 2-8, 403-9 Health and Safety.

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