

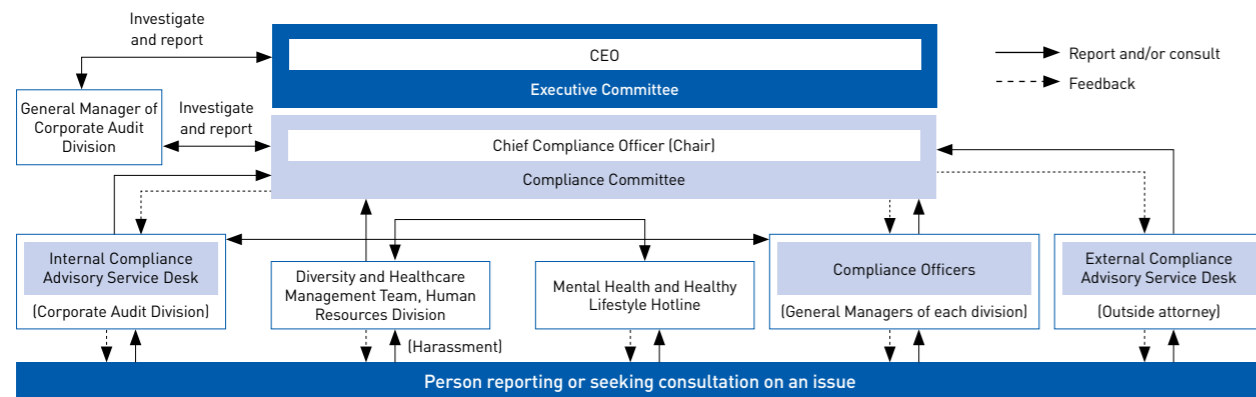
Compliance

For more detailed information on compliance-related matters, please visit our website.
<https://www.mol.co.jp/en/corporate/compliance/index.html>

Compliance Initiatives

In 2014, the Japan Fair Trade Commission (JFTC) found that the MOL Group had violated Article 3 of the Japanese Antimonopoly Act in certain car carrier shipping trades. In response, the MOL Group has updated its compliance rules, which determine the scope and Rules of Conduct of its executives and employees, and provided ongoing training to ensure that the importance of compliance—as the major premise of all corporate activities—is etched deeply into the minds of all executives and employees,

and make it the linchpin of decisions in daily business operations. The Compliance Committee convenes every three months to discuss compliance matters within the Group and respond to any violation incidents. Further, the number and details of compliance events are disclosed within the Company to raise awareness among all executives and employees.

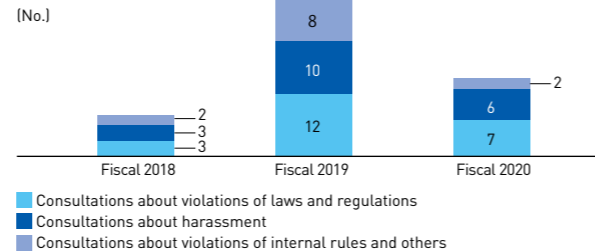


Compliance Advisory Service Desks

The MOL Group has established internal and external compliance advisory service desks available in Japanese and English. These service desks can be used by officers, employees, and temporary staff of MOL and its Group companies. The external advisory service desk is entrusted to an outside attorney to run. The attorney transmits reports and consultations received to the Compliance Committee and continues to serve as a liaison between the Company and people submitting reports or seeking consultations. Both service desks keep reports and consultations strictly confidential and ensure that personnel, including those cooperating with an investigation, are not treated unfairly. We also welcome compliance-related inquiries

through our website from external parties, including customers and suppliers both domestic and international.

Number of Consultations at Internal and External Compliance Advisory Service Desks (No.)



Initiatives to Comply with Antitrust Laws and Prevent Corruption

The MOL Group takes rigorous measures to ensure compliance with the Antitrust Act and prevent corruption. We have an Antimonopoly Act Compliance Code and an Anti-Corruption (Anti-Bribery) Policy, as well as a Do's & Don'ts Guide, which provides a set of more specific guidelines. We also implement a range of training sessions to keep all employees informed by providing them with overviews and points to note in relation to domestic and international laws and regulations.

Anti-Corruption Policy	As stated in its Compliance Policy, to ensure the building of good relationships based on trust with customers and contractors, MOL established the Mitsui O.S.K. Lines' Anti-Corruption Policy in October 2015. This policy eliminates bribery and excessive business entertaining of public servants as well as those outside the government in Japan and overseas.
E-learning	MOL holds continuous e-learning sessions for all employees within the Group, covering antitrust and competition acts, anti-corruption (anti-bribery), and ICT security and governance. Moreover, employees of domestic Group companies receive e-learning on topics about internal control, insider trading, and safety culture. In fiscal 2020, the average participation rate was 96.0% in these three sessions around the world.
Lectures for Executives and Employees	Employees are required to attend lectures on antitrust law upon reaching new position levels, and we also hold lectures on anti-bribery.
Assessment of Organizational Culture	To engender an organizational culture with "self-cleansing" capabilities in relation to compliance violations, we conduct a biannual organizational culture assessment of our employees. Each department head uses the survey to ascertain the issues in their departments and make use of the findings for improvements.

Social Responsibility

Supply Chain Management

MOL procures vessels from shipyards (owned vessels) as well as other shipowners (chartered vessels). Given that marine vessels are the lifeblood of our business, we apply the MOL Safety Standard Specifications to both owned and chartered vessels (with the exception of short-term charters) to make the equipment of all vessels under our control live up to certain standards and keep our Standard Specifications constantly updated to ensure their effectiveness. During the construction of our owned vessels, we send supervisors to the shipyard to keep a close on-site watch on building quality. These supervisors work with shipyard masters and safety management officers to check the situations of sites and identify risk factors for worker injuries and fire outbreaks, requesting improvements if necessary. In light of the accident off Mauritius in 2020, MOL is now working on reinforcing safety management for chartered vessels on all fronts, including deepening its involvement in the selection of crew members that shipowner assign to ships.

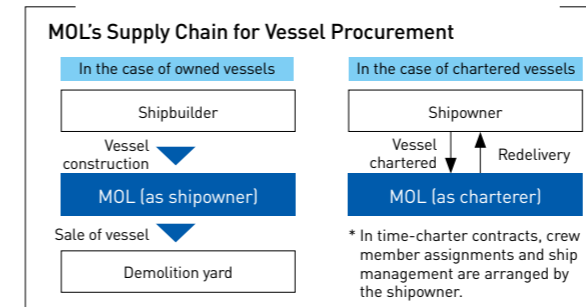
When we sell off our vessels, in cases when the buyer intends to dismantle the vessel, we bind them to use a demolition yard that has third-party certification (from ClassNK)

stating that the yard meets all prescribed safety, environmental, and labor standards and complies with the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships.* We also keep track of the dismantling process by requiring detailed reports of the work.

As described above, by being actively involved in the process even before the delivery of a new vessel from a shipyard or a shipowner as well as in stages after the disposal of a vessel, we will continue to ensure safety, reduce environmental impact, and improve labor conditions of workers.

We also follow the MOL Group Basic Procurement Policy when purchasing any product or service, including vessels.

* The convention was adopted by the IMO in May 2009 to ensure the safe and environmentally sound recycling of ships. As of August 2021, the convention has not yet gone into effect as it is still in the process of being ratified by some countries. The convention requires vessels to prepare, record, and update inventory lists showing the quantity and location of hazardous materials within the ship's structure and onboard supplies. It also establishes the conditions required of ship recycling facilities (demolition yards). Ahead of the convention's enforcement, MOL has already adopted rules for demolition yard selection pursuant to the convention.



MOL Group Basic Procurement Policy

With the following basic policy:

1. We comply with applicable laws, regulations and social norms, and pay due consideration to the protection of the environment.
 2. We procure goods and/or services, including the delivery or execution of such goods and/or services, that meet high safety standards.
 3. We conduct fair trade, and endeavor to establish trusting relationships with contractors.
- We work to make sure that our contractors understand our Basic Procurement Policy, with the aim of contributing toward the realization of sustainable societies together.

Human Rights

In 2005, MOL became the first Japanese shipping company to participate in the United Nations (UN) Global Compact. We express our support for, and practice of, universal principles regarding human rights and labor, and we have published a statement on our website in line with the UK Modern Slavery Act of 2015. Our Rules of Conduct, which ensures compliance by our officers and employees also includes an article on "Respect for human rights and prohibition of discrimination or harassment." This article codifies and demands compliance with rules on respect for human rights, banning of discrimination, understanding of different cultures and customs, and prevention of harassment.

Initiatives to Safeguard the Human Rights of Our Crews

MOL adheres to the four fundamental rights of seafarers stipulated under Maritime Labour Convention 2006: (1) Freedom of association and the effective recognition of the right to collective bargaining, (2) The elimination of all forms of forced or compulsory labor, (3) The effective abolition of child labor, and (4) The elimination of discrimination in respect of employment and occupation. Our internal maritime compliance policy also prohibits discrimination and establishes procedures for dealing with complaints about harassment.

Awareness Campaigns

To instill thorough awareness of human rights, MOL holds lectures on human rights as part of its Head Office stratified training. The Company also holds harassment prevention lecture sessions as part of pre-orientation for personnel before they are assigned to positions in Group companies, etc., in Japan or overseas.

10 Principles of the UN Global Compact

Human Rights	1. Business should support and respect the protection of internationally proclaimed human rights; and 2. Make sure that they are not complicit in human rights abuses.
Labor	3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; 4. The elimination of all forms of forced and compulsory labor; 5. The effective abolition of child labor; and 6. The elimination of discrimination in respect of employment and occupation.
Environment	7. Businesses should support a precautionary approach to environmental challenges; 8. Undertake initiatives to promote greater environmental responsibility; and 9. Encourage the development and diffusion of environmentally friendly technologies.
Anti-Corruption	10. Businesses should work against corruption in all its forms, including extortion and bribery.