MOL Group Global Tax Management Policy

1. Purpose

The Mitsui O.S.K. Lines Group (the "MOL Group") has established a corporate policy for its company values and code of conduct, referred to as "MOL CHARTS". MOL CHARTS stipulates that MOL Group companies should "Keep compliance as a Top Priority" and "Ensure that actions comply with social norms and the highest ethical standards".

As the MOL Group companies operate globally, the MOL Group believes ensuring tax transparency and paying appropriate taxes are among the companies' most fundamental and important social responsibilities. In order to fulfill these responsibilities, the MOL Group sets forth this policy (hereinafter, the "MOL Group Global Tax Management Policy") to serve as guidance for its tax-related actions.

2. Compliance

The MOL Group complies with the spirit and letter of the tax laws and regulations applicable in all countries and regions in which it operates. It fulfills its tax compliance obligations, including the fair payment of taxes, in accordance with international tax rules and guidance, such as the OECD Guidelines.

3. Tax Governance

The MOL Group aims to establish and appropriately implement an effective group-wide tax governance structure, led by the Chief Financial Officer (CFO) of the Group's head office, in order to ensure tax operations are conducted in line with the MOL Group Global Tax Management Policy.

4. Tax Risk Management

The MOL Group strives to minimize tax risks by identifying them appropriately, and utilizing external professionals as well as advance rulings with tax authorities, where necessary, if significant tax risks are identified.

5. Tax Efficiency and Use of Tax Benefits to Maximize Enterprise Value

Where available, the MOL Group seeks tax efficiency via elimination of double taxation and application of tax incentives and benefits. Such measures are conducted with consideration to the purpose of the tax systems as well as the intentions of the relevant tax laws and regulations and are guided by compliance with such rules. Use of such benefits is based on rational business purposes. The MOL Group utilizes these tax incentives and benefits to improve financial indicators and maximize free cash flow.

6. Relationship with Tax Authorities

The MOL Group responds to requests for information from tax authorities in a timely and appropriate manner. In addition, the MOL Group builds and maintains positive relationships with tax authorities through constructive communication.

7. Ensuring Transparency

The MOL Group aims to ensure tax transparency and strives to fulfill its accountability to stakeholders through appropriate disclosure of tax-related information.

8. Prohibition of Tax Avoidance Activities

The MOL Group does not engage in tax planning that deviates from the intent and purpose of laws and regulations of each country for the purposes of mitigating or avoiding tax obligations. In particular, the MOL Group does not use any organizational structures or utilize low-tax countries (so-called tax havens) without business rationale and substance.

9. Transfer Pricing

The MOL Group sets prices for intra-group transactions based on functions assumed and business risks borne. The MOL Group's transfer pricing policies strive to allocate income earned from business activities appropriately in each country, based on arm's length prices and in accordance with laws and regulations of each country, as well as the OECD Transfer Pricing Guidelines. Further, the MOL Group prepares appropriate transfer pricing documentation in accordance with laws and regulations of each country.

As the fundamental policy on taxation across the entire Group, the "MOL Group Global Tax Management Policy" has been established, approved by the Executive Committee, reported to the Meeting of Board of Directors, and subsequently disclosed to the public. This policy applies to the Business Organization, Corporate Organization, and Regional Organization of Mitsui O.S.K. Lines, as well as to its domestic and overseas group companies.

Established on 31st of July 2026
Mitsui O.S.K. Lines, Ltd.