

## TSAKOS ENERGY NAVIGATION LIMITED

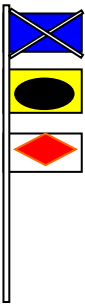
### WHISTLEBLOWING POLICY

#### 1. **The Scope of the Policy**

- A. This Whistleblowing Policy (the “Policy”) applies to all directors, officers, contractors, and employees of (1) Tsakos Energy Navigation Limited and its subsidiaries and other business entities controlled by it (collectively, the “Company”); (2) affiliates and entities that regularly provide management or other services to the Company, including but not limited to Tsakos Energy Management Limited, Tsakos Shipping & Trading S.A., and Tsakos Columbia Ship Management S.A. (each a “Management Company” and collectively the “Management Companies”). Collectively, the Company’s and the Management Companies’ directors, officers, contractors, and employees are referred to as “Covered Persons”.
- B. Furthermore, this Policy extends protection to other individuals that may be subject to indirect retaliatory measures due to a report, as in the case of vis-à-vis facilitators, colleagues, relatives, or legal counsel representing a reporting person. Covered Persons and all individuals protected in accordance with this section 1, B, are collectively referred to as “Protected Persons”.
- C. Compliance with this Policy and with the law is required and is an ongoing responsibility of all Covered Persons.

#### 2. **The Purpose of the Policy**

- A. The purpose of this Policy is to explain the Company’s rules with respect to reporting instances of suspected or potential misconduct, illegal acts, or failure to act according to Company’s policies. This Policy encourages Covered Persons and others who have serious concerns about any aspect of the Company’s or any Management Company’s business or any Covered Person’s ethical conduct to come forward and voice those concerns. This Policy requires any Covered Person to report any instance of suspected or potential failure by any Covered Person to act with integrity or within the law or Company’s policies.
- B. This Policy supplements the Company’s Code of Business Conduct and Ethics, which may be found at: <https://www.tenn.gr/wp-content/uploads/2017/05/Code-Of-Ethics.pdf>.
- C. The ethical conduct and integrity of the Company’s business practices, and financial information is paramount. The Company’s financial information guides the decisions of its management team and Board of Directors and is relied upon by its shareholders and the financial markets. For these reasons, the Covered Persons must maintain a workplace where employees can raise concerns, free of fear of any retaliation, discrimination, or harassment, when they reasonably believe that they are aware of illegal or unethical conduct, or of questionable accounting, internal controls, and auditing matters, or other financial or business matters, or the existence of inaccurate financial information.



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D. The Company's Board of Directors has an Audit Committee, whose functions include to ensure that there are systems in place to enable appropriate reporting to it of allegations or complaints received by the Covered Persons regarding potential illegal or unethical conduct, accounting, internal controls and auditing or other financial or business matters, as well as the confidential and anonymous submission by employees of concerns about questionable employee behaviour impacting the conduct of ethical business practices.

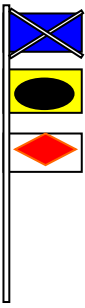
### **3. TEN's Whistleblowing Policy**

A. Covered Persons are expected to perform their duties ethically, honestly and with integrity. If any Covered Person has any concerns about any conduct which is believed in good faith to be a violation or potential violation of the law or of any Company policies, or any questionable accounting or auditing matters of the Company, they shall report such concerns in a timely fashion in any of the following ways:

- Email Compliance & Internal Audit Department and/or Corporate Counsel at [compliance@tenn.gr](mailto:compliance@tenn.gr);
- Submit a complaint by following the link: <https://tenltd.gan-compliance.com/p/Case>

In handling any report, the Company and the Management Companies shall at all times protect the identity of the reporter and all parties mentioned in a report and take appropriate measures to ensure that the information contained in a report is not accessible for non-authorized staff members.

- B. By reporting misconduct, Covered Persons are contributing to the Company's ethical culture and upholding the Company's values. All such reports shall be treated confidentially subject to local laws, data privacy regulations, and legal disclosure requirements which may in some jurisdictions and circumstances limit or restrict the availability and scope of anonymity.
- C. Failure to report improper behaviour may itself consist of a violation of this Policy. Covered Persons have a duty to cooperate with any investigation into known or suspected violations of Company policies or the law.
- D. The Company prohibits retaliation in any form against any person for making a good faith report under this Policy or for cooperating with an investigation into an alleged violation of this Policy or the law – even if the report is not substantiated. Anyone found to have retaliated against someone for making such a report will be subject to corrective action, up to and including termination of employment.



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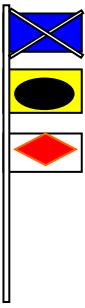
### WHISTLEBLOWING POLICY

#### 4. Investigation

- A. Upon the receipt of an allegation or complaint (the “Complaint”), the Compliance & Internal Audit Department will (i) determine whether the Complaint relates to potential violation of the law or of any Company policies, or to improper accounting, internal controls, or auditing matters, to other financial or business matters, or other unethical behaviour and (ii) when possible, acknowledge receipt of the Complaint to the reporting person.
- B. If a Complaint relates to potentially illegal or unethical behaviour or to improper accounting, internal controls or auditing matters, or other financial or business matters, the Head of Compliance & Internal Audit will discuss such Complaint with the Audit Committee and the Legal Department to determine the scope of investigation to be conducted, to appoint the employee that will be in charge of the investigation or the investigation team, the validity of the Complaint and any corrective action, as appropriate. All Covered Persons have a duty to promptly cooperate and provide accurate information in connection with any investigation of reports of questionable conduct, or of discrimination, retaliation or harassment resulting from the reporting or investigation of a Complaint.
- C. The Audit Committee has the authority to retain outside legal, accounting or other consultants or advisors in any investigation if it deems it necessary to conduct the investigation in accordance with its charter and this Policy.
- D. All Complaints will be taken seriously and will be promptly investigated. The specific action taken in any particular case depends on the nature and gravity of the alleged conduct or circumstances reported and the results of the investigation. Any corrective action will be proportionate to the seriousness of any confirmed offense. This action may include disciplinary action against the accused party, up to and including termination of employment or any other working relationship that the offending party may have with the Company or with a Management Company. Reasonable and necessary steps will also be taken to prevent any further such unethical conduct from occurring.

#### 5. Anti-Retaliation Policy

- A. The Company prohibits any form of retaliation against any Protected Person who, in good faith and for lawful purposes, report to the Company any conduct or activity that may violate any law applicable to the Company, to the Management Companies or to their business, any corporate policy or any other suspected improper, unethical, or illegal conduct or activities by any Covered Person in relation to the Company’s or to the Management Companies’ business. This Policy prohibits any form of retaliation against Protected Persons who provide information, cause information to be provided or assist in an investigation conducted by the Company or a Management Company or any regulatory or law enforcement agency or legislative body, regarding a possible



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violation of any law relating to fraud, any fair employment practices law, or any rule or regulation of the United States Securities and Exchange Commission, or who file, cause to be filed, or assist, participate or give testimony in any proceeding relating to an alleged violation of any such law, rule or regulation, and nothing in this Policy prohibits any such Protected Person from providing such information or engaging in such activities.

#### **6. Management Responsibility**

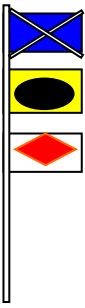
- A. All managers of the Company and of the Management Companies are responsible for ensuring adherence to the Company's anti-retaliation policy. In addition, each manager is responsible for communicating this Policy to employees under his or her supervision and for supporting programs and practices designed to develop understanding of, commitment to and compliance with this Policy. If any supervisor or manager believes that a violation of this Policy has occurred or receives a report of a violation, he or she must immediately contact the Head of Compliance & Internal Audit and/or the Legal Department at [compliance@tenn.gr](mailto:compliance@tenn.gr), or submit a report at <https://tenltd.gan-compliance.com/p/Case>

#### **7. Procedures For Reporting Retaliation**

- A. If any Protected Person believes that he or she has been retaliated against (including threatened or harassed) in violation of this Policy, he or she should immediately report it to his or her immediate supervisor or manager, the Audit Committee and/or the Head of Compliance & Internal Audit and/or the Legal Department as described in 3A above. Once a Protected Person reports retaliation prohibited by this policy, the Company will promptly investigate the matter. The investigation will be handled as discreetly as practicable, allowing for a fair investigation and any necessary corrective action. Appropriate corrective action will be taken by the Company or the Management Company, as the case may be, whenever a violation of this policy is determined to have occurred. Depending on the nature of the violation, the offending individual can be subject to disciplinary action up to and including termination of employment. In addition, anyone who interferes with an investigation, or provides information in an investigation that the individual knows to be untrue or inaccurate, will be subject to disciplinary action, up to and including termination of employment. Retaliation against Protected Persons who in good faith file a complaint or participate in an investigation is strictly prohibited.

#### **8. Confidentiality & Personal Data Protection**

- A. All information disclosed during the course of any investigation conducted with respect to matters reported under this policy will remain confidential, except as reasonably necessary to conduct the investigation, to allow the Company or a Management Company to take any remedial action and/or to comply with applicable law.



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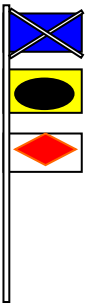
- B. Collection and further processing of personal data are carried out in compliance with the applicable Data Protection Legislation. For further information on the protection of personal data, please refer to the relevant Policy in Annex I below.

#### 9. Records Retention

- A. The Company will maintain records of complaint reports consistent with its document retention policy in effect as applicable and in compliance with applicable law. It may be illegal and is against the Company's policy to destroy any records that may be subject to or related to an investigation by the Company or any governmental body.

#### 10. Compliance with procedures

- A. The Management Companies agree with the Company that they will comply with the requirements of its Whistleblowing Policy and will cooperate with it in investigating and punishing any breaches of it.



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#### **ANNEX I - PRIVACY NOTICE**

##### **PREAMBLE**

The online-tool (<https://tenltd.gan-compliance.com/p/Case>) is owned and operated by Tsakos Energy Navigation Limited (“The Company”, “TEN”, “we”), which is committed to complying with any applicable Data Protection Legislation<sup>1</sup>.

This Privacy Notice provides information on the collection of personal data during the use of this whistleblowing online-tool (“The Tool”). It also explains how personal data are used, shared and protected as well as how the users (“The users”, “you”, “The Data Subjects”) can exercise their rights in this respect.

##### **DATA PROTECTION PRINCIPLES**

The following principles lie at the heart of the Company’s approach to processing personal data:

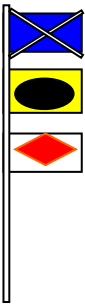
1. Lawfulness, fairness and transparency;
2. Purpose limitation;
3. Data minimization;
4. Accuracy;
5. Storage limitation;
6. Integrity and confidentiality (security);
7. Accountability.

##### **THE CATEGORIES OF PERSONAL DATA THAT WE COLLECT**

Personal data are information that relates to an identified or identifiable individual. They could be as simple as a name or a number or could include other identifiers such as an IP address or a cookie identifier.

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<sup>1</sup> all laws relating to the processing of Personal Data, Privacy and Security (confidentiality, integrity, availability), including, without limitation: i) the European General Data Protection Regulation (EU) 2016/679 (“GDPR”), ii) the European Privacy and Electronic Communications Directive 2002/58/EC and iii) their implementing rules (including Decisions, Guidelines and any Codes of Practice issued by the European Data Protection Board (EDPB) and the Greek Data Protection Authorities).



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#### A. Named Reports

The following personal data/categories of personal data are processed when you submit a named report:

1. **Identification Data:** Your Full name;
2. **Contact Details:** Your email address, your phone number (when filled in the relevant form);
3. **Your relationship to the Company (when provided):** (former) director, officer, employee, seafarer, vendor, contractor, customer.
4. **Details of the incident reported:** Any personal data (relating to you and/or third parties) included in the description of each incident and relevant evidence submitted via the form as well as in any messages sent to the Investigation Team as per our Whistleblowing Policy.
5. Any personal data (relating to you and/or third parties) collected during the investigation of the incident reported.

#### B. Anonymous Reports

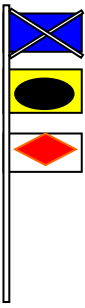
No personal data relating to you are collected and further processed when you submit a report anonymously. However, we might process third parties' personal data when included in your description of each incident and relevant evidence submitted via the form as well as in any messages sent to the Investigation Team as per our Whistleblowing Policy.

TEN collects no technical data, including, but not limited to, metadata, that could potentially identify a specific individual when using the Tool.

### PURPOSE AND LEGAL BASIS OF DATA PROCESSING

We collect and further process your personal data in order to handle your reports and further investigate incidents (when required). The legal bases of the processing are:

1. compliance with our legal obligations (Art. 6(1)(c) of the GDPR), including, but not limited to, those under the Directive (EU) 2019/1937 and its implementing Greek L. 4990/2022;
2. the legitimate interests pursued by the Company (Art. 6(1)(f) of the GDPR), namely applying good corporate governance;
3. your special categories of personal data are manifestly made public by you (Art. 9(2)(e) of the GDPR);
4. the establishment, exercise or defense of legal claims (Art. 9(2)(f) of the GDPR).



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#### **WHO WE MIGHT SHARE YOUR PERSONAL DATA WITH**

Your personal data may become available to TEN's Audit Committee as per the applicable Whistleblowing Policy as well as to authorized personnel of the following TEN Departments:

- a) Compliance & Internal Audit;
- b) Legal.

The Company may share your personal data only when necessary for the fulfillment of the purposes described above (under 4) or an obligation imposed by law, in particular with:

1. The Provider of the Tool that has given sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the applicable Data Protection Legislation and ensure the protection of the rights of the Data Subjects;
2. Auditors so that we meet our audit responsibilities when deemed necessary;
3. Lawyers and other professional advisors for the purpose of seeking legal and other professional advice, when necessary, based on the nature and content of each reported incident;
4. Regulatory and other public authorities, so that we meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts.
5. Authorized personnel of affiliates and entities that regularly provide management or other services to the Company, including, but not limited to, Tsakos Energy Management Limited, Tsakos Shipping & Trading S.A., and Tsakos Columbia Ship Management S.A.

Such sharing or transfers of personal data are adequately safeguarded (e.g. via appropriate contractual clauses, data processing agreements, policies/ rules for intra-Company disclosures of personal data, etc.). Especially when recipients operate outside the EEA, the Company implements appropriate measures, including standard contractual clauses approved by the European Commission, to ensure that the personal data transferred remain adequately protected.

#### **SECURITY SAFEGUARDS**

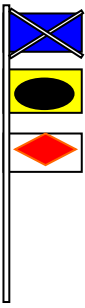
We recognize the importance of information security, and we implement appropriate technical and organizational measures as well as physical and logical security rules and procedures. These measures, rules and procedures are constantly reviewed and enhanced.

#### **DATA RETENTION**

We are committed not to retain personal data for a period longer than necessary for the above – mentioned (under 4) purposes for which the personal data were obtained, except where:

- a) further retention is legally required;
- b) personal data are necessary for the establishment, exercise or defence of legal claims .





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#### DATA SUBJECTS' RIGHTS

In accordance with the applicable Data Protection Legislation, Data Subjects have the following rights:

- The right to be informed regarding their personal data being processed;
- The right to request access to and rectification of their personal data;
- Subject to limitations as provided for in the applicable Data Protection Legislation, the right to request restriction of the processing of their personal data.
- Subject to limitations as provided for in the applicable Data Protection Legislation, the right to request erasure of their personal data.
- Subject to limitations as provided for in the applicable Data Protection Legislation, the right to object to the processing of their personal data.

In compliance with the applicable Whistleblowing Legislation, including, but not limited to, the Art. 15 par. 5, 6 of the Greek L. 4990/2022, TEN may not provide information as per Art. 12-14 and/or respond to requests submitted by Data Subjects under Art. 15 to 22 of the GDPR, when deemed necessary for the purposes of handling reports, conducting effective investigation and preventing retaliation against any Protected Person.

You have the right to lodge a complaint with the competent data protection authority, the Hellenic Data Protection Authority, located in Athens, 1 – 3 Kifisias Avenue, P.C. 115 23 (tel. +30 210 64 75 628 – email: [complaints@dpa.gr](mailto:complaints@dpa.gr)).

#### CONTACT US

To exercise any of the Data Subjects' rights or make a complaint to us relating to your privacy or for any other information on the use of your personal data, you may contact the **Compliance & Internal Audit Department** at [compliance@tenn.gr](mailto:compliance@tenn.gr).

#### CHANGES

This Privacy Notice may be amended. Any amendments will become effective once the revised documents are posted online. We encourage you to periodically review this Privacy Notice to be aware of how we collect, use and share your personal data.