

TSAKOS ENERGY NAVIGATION LIMITED

HUMAN RIGHTS POLICY

1. **The Scope of the Policy**

- A. This Human Rights Policy (the “Policy”) applies to all directors, officers, contractors, and employees of: (1) Tsakos Energy Navigation Limited (“TEN”) 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 and Tsakos Shipping & Trading S.A. (each a “Management Company” and collectively the “Management Companies”); (3) Clients and business partners of the Company or the Management Companies, such as charterers, energy majors, commodity traders, energy importers, and other entities engaged in the transportation of oil, gas, and other cargoes with the Company (each a “Client”); (4) Any person or entity performing duties for, providing services to, or acting on behalf of the Company, the Management Companies, or Clients (each a “Third Party”). Collectively, the Company, the Management Companies, Clients, and Third Parties are referred to as “Covered Persons.”
- B. Compliance with this Policy and with the law is required and is an ongoing responsibility of all Covered Persons.

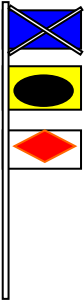
2. **Policy Statement**

TEN is dedicated to a human-centered culture where the needs, wellbeing, and performance of all personnel are prioritized, ensuring an environment of equality, fairness, and respect. As an Equal Opportunity Employer, TEN prohibits all forms of discrimination and harassment, emphasizing the importance of valuing employees for the company's innovation and sustainability. Open dialogue and ethical leadership are crucial for fostering a positive environment where merit-based recognition and employee development are prioritized. Human Resources processes are designed to align with company needs, supporting productivity and innovation through effective recruitment, retention, and development strategies. The company is committed to constructive, ethical dialogue with employees, maintaining a diverse, respectful, and harassment-free workplace.

A. Non-Discrimination and Equal Opportunity

TEN is committed to the principle of equal employment opportunity for all employees and to providing a work environment free of discrimination and harassment. Discrimination includes all unequal treatment, exclusion, or preference on the basis of race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin, or any other characteristic that results in compromising the principle of equality.

All employment decisions at the Company are based on business needs, job requirements, and individual qualifications, without regard to race, color, religion or belief, national, social, or ethnic origin, sex (including pregnancy), age (excluding minors not provided by national or international Labor Legislation), physical, mental or sensory disability, HIV status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate. TEN will not



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tolerate discrimination or harassment based on any of these characteristics or any incidents of potential discrimination against colleagues or others affected by our operations.

The Company is fully committed to ensuring that all personnel are working in an environment that assures human rights.

B. Respect for Human Rights

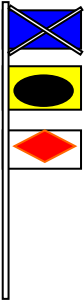
Covered Persons shall fully respect the human rights, dignity, and worth of all persons and shall act with understanding, tolerance, sensitivity, and respect for diversity without discrimination of any kind. The same is expected of the Company's suppliers and contractors.

3. Guiding Principles

1. **Fundamental Human Rights:** Fundamental human rights, social justice, dignity, and worth of the human person, and respect for the equal rights of people are values governing the Company and its employees.
2. **Tolerance and Understanding:** Tolerance and understanding are basic human values essential for all people, who should be treated with respect equally, without any distinction. This respect fosters a climate and a working environment sensitive to the needs of all.
3. **Shared Vision:** All employees should share the vision of the Company. Loyalty to this vision ensures their integrity; a shared vision guarantees that they will place the interests of the Company above their own and use its resources responsibly.
4. **Integrity:** The concept of integrity enshrined in this policy embraces all aspects of employees' behavior, including qualities such as honesty, truthfulness, impartiality, and incorruptibility. These qualities are as basic as competence and efficiency.
5. **Equality:** Freedom from discrimination is a basic human right. Employees are expected to respect the dignity, worth, and equality of all people without any distinction whatsoever. Assumptions based on stereotypes must be avoided. One of the main tenets of the Company is the equality of men and women, and it should promote gender equality.
6. **Anti-Harassment:** Harassment in any form is an affront to human dignity, and employees must not engage in any form of harassment. Employees have the right to a workplace environment free of harassment or abuse. The Company prohibits any kind of harassment and has a duty to establish rules and provide guidance on what constitutes harassment and abuse of authority and how unacceptable behavior will be addressed.
7. **Dialogue:** Continuing dialogue between staff and management is indispensable. Management should facilitate this dialogue.

4. Working Relations

1. **Leadership Responsibility:** Managers and supervisors are in positions of leadership, and it is their responsibility to ensure a harmonious workplace based on mutual respect. They



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should be open to all views and opinions and ensure that the merits of staff are properly recognized. They need to provide support, especially when staff are subject to criticism arising from the performance of their duties. Managers are also responsible for guiding and motivating their staff and promoting their development.

2. **Role Models:** Managers and supervisors serve as role models and have a special obligation to uphold the highest standards of conduct. It is improper for them to solicit favors, gifts, or loans from their staff; they must act impartially, without favoritism or intimidation. In matters relating to the appointment or career of others, employees should not try to influence colleagues for personal reasons.
3. **Effective Communication:** Managers and supervisors should communicate effectively with their staff and share relevant information with them. Employees have a reciprocal responsibility to provide all pertinent facts and information to their supervisors and to abide by and defend any decisions taken, even when those do not accord with their personal views.
4. **Adherence by Contractors and Suppliers:** Contractors and suppliers shall fully adhere to the policy on human rights.

5. Confidentiality

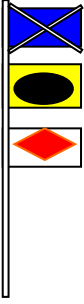
All reports regarding human rights concerns shall be handled with the highest level of confidentiality, in order to safeguard each reporting person's privacy. Any information included, but not limited to, personal data will be processed by authorized persons that have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality. Information included in each report might not be transferred, transmitted or otherwise disclosed to unauthorized third parties, except where this is absolutely necessary towards the proper resolution of the incident reported or compliance with applicable laws and rulings.

In case of violation of this clause, the Company has the right to immediately terminate the contract and impose disciplinary and/ or legal sanctions.

6. Anti-Retaliation Policy

The Company enforces a strict anti-retaliation policy to protect any person who, in good faith, reports human rights concerns. Any form of reprisal, such as dismissal, demotion, or harassment, is strictly prohibited by the Company that wishes to safeguard human rights.

If reporting persons believe that they have been retaliated in violation of this Policy, they should immediately report it to their immediate supervisor or manager, the Audit Committee and/or the Compliance & Internal Audit and/or the Legal Department. The Company will promptly investigate the matter, and appropriate corrective actions will be taken. Depending on the nature of the violation, the offending individual can be subject to disciplinary and/ or legal action, up to and including termination of employment.



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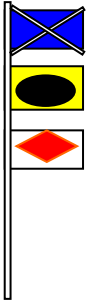
7. **Reporting and Investigation**

A. Reporting Concerns

If any Covered Person has any concerns about potential violations of human rights, 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 reporting@tenn.gr;
- Submit a complaint by following the link: <https://tenltd.gan-compliance.com/p/Case>

This Policy is subject to regular review and updates to ensure alignment with best practices and the strategic needs of TEN LTD. All Covered Persons are expected to adhere to the principles and guidelines outlined herein to maintain the integrity and effectiveness of the Company's human rights efforts.



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ANNEX I - PRIVACY NOTICE

INTRODUCTION

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 Legislation¹.

This Privacy Notice provides information on the collection of personal data during the use of this reporting 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

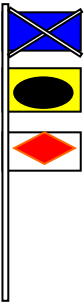
The following principles lie at the heart of the Company’s approach to processing personal data:

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 is 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.

¹ 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.
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 is 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.

TEN collects no technical data, including, but not limited to, metadata, which 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),
2. the legitimate interests pursued by the Company (Art. 6(1)(f) of the GDPR), namely applying good corporate governance.

As regards the processing of special categories of personal data:

3. The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Company and the data subject in the field of employment law (Art.9(2)(b) GDPR).
4. The processing relates to personal data which is manifestly made public by the Data



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Subject (Art.9(2)(e) GDPR).

5. The processing is necessary for the establishment, exercise or defence of legal claims (Art.9(2)(f) GDPR).

WHO WE MIGHT SHARE YOUR PERSONAL DATA WITH

Your personal data may become available to authorized personnel of the following TEN Departments:

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

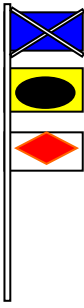
The Company may share your personal data only when necessary for the fulfillment of the purposes described above (under 4) or an obligation imposed by law, in particular with:

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. 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 and Tsakos Shipping & Trading 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 remains 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.



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DATA RETENTION

The personal data collected is retained for five (calendar) years after the closure of each case-filing of the relevant report. Depending on the content of the report – the incident reported, the retention period might be extended for the purpose of the establishment, exercise or defense of legal claims.

DATA SUBJECTS' RIGHTS

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

- The right to be informed on 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.

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).

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 **Company's Data Protection Officer** at dpo@tsthellas.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.