TSAKOS ENERGY NAVIGATION LIMITED

SUPPLIERS' CODE OF CONDUCT

1. The Scope of the Suppliers' Code of Conduct

Tsakos Energy Navigation ("TEN", the "Company") is committed to conducting business in an ethical, transparent, and responsible manner. We expect the same commitment from our suppliers. This Suppliers Code of Conduct outlines the principles and standards that TEN suppliers must adhere to in their business operations and interactions with TEN.

2. Applicability

This Code of Conduct (the "Code") applies to all contractors 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) Any person or entity performing duties for, providing services to, or acting on behalf of the Company or the Management Companies (each a "Third Party").

3. Ethical Business Practices

3.1 Integrity and Transparency

- Suppliers must conduct their business in an ethical manner, ensuring transparency and honesty in all interactions with TEN.
- All business activities must comply with applicable laws, regulations, and international standards.

3.2 Prevention of Fraud and Corruption

- Suppliers must maintain zero tolerance for any form of bribery, corruption, extortion, or embezzlement.
- Suppliers are prohibited from offering, giving, soliciting, or receiving any form of bribe or kickback.
- Suppliers must not request, receive, or accept any improper advantage to obtain or retain business. They must also not offer or give any improper advantage to public officials or private sector entities to gain business advantages.
- Suppliers must not offer gifts, hospitality, or expenses to TEN employees or representatives except for promotional items of minimal value or reasonable hospitality for clear business purposes. Travel and accommodation for TEN representatives will always be paid by TEN.

3.3 Fair Competition

- Suppliers must engage in fair business practices, including respecting intellectual property rights and avoiding anti-competitive conduct.

3.4 Conflict of Interest

- Suppliers must avoid any situations where a conflict of interest might arise and must disclose any actual or potential conflicts of interest to TEN.

4. Labor and Human Rights

4.1 Freely Chosen Employment

- Suppliers must not use forced, bonded, or indentured labor or involuntary prison labor. Employment must be freely chosen.

4.2 Child Labor

- Suppliers must not employ individuals below the legal minimum working age as defined by national laws and regulations.

4.3 Working Hours and Wages

- Suppliers must comply with applicable wage laws, including minimum wage, overtime, and legally mandated benefits.
- Working hours must not exceed the maximum set by local laws.

4.4 Non-Discrimination

- Suppliers must provide a workplace free of harassment and discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status. Suppliers must also respect and protect the social, cultural, religious, and spiritual values of minorities, indigenous, and tribal peoples, actively managing and mitigating any adverse impacts on these communities.

4.5 Health and Safety

- Suppliers must provide a safe and healthy work environment for all employees, complying with all applicable health and safety laws and regulations.

4.6 Freedom of Association & Right to Collective Bargaining

- Suppliers recognize that employees are entitled to be or refrain from being union members and to be represented in collective bargaining agreements. In countries where these rights are restricted, employees should still have the right to influence their work situation.

5. Environmental Responsibility

5.1 Environmental Protection

- Suppliers must comply with all applicable environmental laws and regulations.
- Suppliers are encouraged to minimize their environmental footprint by adopting sustainable practices and reducing waste, emissions, and energy consumption.

5.2 ESG (Environmental, Social, and Governance)

- Suppliers must develop and implement ESG policies and practices that promote sustainability, ethical labor practices, and good governance.
- Suppliers are encouraged to report on their ESG performance and work towards continuous improvement in these areas.

6. Quality Policies

6.1 Quality Management Systems

- Suppliers must implement and maintain quality management systems in line with internationally recognized standards such as ISO 9001 or equivalent.
- Suppliers should regularly review and improve their quality management practices to ensure the highest standards of product and service delivery.

7. Cybersecurity

7.1 Cybersecurity Measures

- Suppliers must implement robust cybersecurity measures to protect sensitive information and ensure the integrity, confidentiality, and availability of data.
- Suppliers are expected to comply with relevant cybersecurity laws and standards and to continuously monitor and improve their cybersecurity practices.

8. Personal Data Protection

8.1 Data Privacy

- Suppliers must comply with all applicable data protection laws and regulations, including but not limited to the General Data Protection Regulation (GDPR) and other relevant privacy laws.
- Suppliers must implement appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, alteration, or destruction.
- Suppliers should provide appropriate safeguards, ensuring the enforceability of data subjects' rights and the availability of effective legal remedies for data subjects.
- Suppliers are required to notify TEN promptly in the event of any data breach involving personal data related to TEN or its stakeholders.

9. Supply Chain Management

9.1 Subcontractors

- Suppliers must ensure that their subcontractors comply with the standards set forth in this Code of Conduct.
- Suppliers must conduct due diligence on their subcontractors to ensure adherence to ethical, labor, and environmental standards.

10. Additional Provisions

10.1 Sanctions

- Suppliers must not attempt to bypass any sanctions, prohibitions, or restrictions under United Nations resolutions or the trade or economic sanctions laws and regulations of the EU, UK, USA, or any other applicable jurisdiction.

10.2 Conflict of Interest

- Suppliers and their employees must avoid any actual or perceived conflicts of interest and promptly notify TEN of any such conflicts.

10.3 Security Resources

- Suppliers must use thorough selection processes to secure high-standard security staff and suppliers, avoiding or managing potential human rights impacts.

10.4 Community Impact

- Suppliers must respect local communities and work to prevent and mitigate adverse impacts related to livelihoods, water use, emissions, and land.

11. Compliance and Monitoring

11.1 Audits and Assessments

- TEN reserves the right to audit and assess supplier compliance with this Code of Conduct. Suppliers must provide access to relevant records and cooperate fully with any audit or assessment.

11.2 Reporting Violations

- Suppliers must report any suspected violations of this Code of Conduct or any unethical behavior to TEN. Confidentiality and protection from retaliation will be provided for whistleblowers. Reports can be submitted via email to the Compliance & Internal Audit Department and/or Corporate Counsel at reporting@tenn.gr, or by following the link: External Submission Portal.

11.3 Corrective Actions

- If a supplier is found to be in violation of this Code, TEN will require the supplier to take corrective action. Persistent failure to comply may result in termination of the business relationship.

By adhering to this Code of Conduct, suppliers contribute to the mutual success and sustainability of their own businesses and that of TEN. We value our partnerships and expect all suppliers to demonstrate a commitment to ethical practices, respect for human rights, and environmental commitment.

By reading this document, you acknowledge that you fulfill the requirements outlined in this Supplier Code of Conduct. If you cannot provide supporting documentation, you agree to initiate a process to document your compliance upon our request. This policy also applies to your employees and subcontractors.