

TSAKOS ENERGY NAVIGATION LIMITED

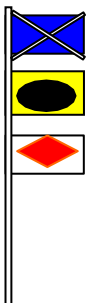
WHISTLEBLOWING POLICY

1. The Scope of the Policy

- A. This Whistleblowing Policy (the “Policy”) applies to all directors, officers, contractors, suppliers, employees and trainees 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”). The Policy also applies to any third party that has business relationship with the Company or the Management Companies, including, but not limited to, charterers, energy majors, commodity traders, energy importers, other entities engaged in the transportation of oil, gas, other cargoes with the Company, as well as 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’s and the Management Companies’ directors, officers, contractors, suppliers, employees, trainees, and Third Parties 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 (including, but not limited to any (potential) breaches of the Union Law), 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 applicable ethical conduct to come forward and voice those concerns. This Policy requires any Covered Person to report any instance of suspected or potential failure 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, a workplace, where Covered Persons 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



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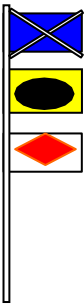
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matters, or the existence of inaccurate financial information, must be maintained.

- 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 Covered Persons of concerns about questionable behavior impacting the conduct of ethical business practices.

3. **Reporting Details**

- A. The Company has established a Reporting System, a (Whistleblowing) procedure - mechanism, through which concerns, complaints and requests might be submitted in compliance with the applicable reporting / whistleblowing legislation including, but not limited to, the Greek Law 4990/2022, as amended and currently in force, the Ministerial Decision (47312/11-12-2023), the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 and 18 U.S. Code 1514A. This mechanism is established for the purpose of receipt, retention, and handling of confidential reports/complaints submitted by the Covered Persons.
- B. If Covered Persons have 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 have the right to submit a report/complaint online through the Company's Whistleblowing Reporting System 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>
- C. The Reporting System is used for reporting (potential) breaches of the applicable legislation concerning, inter alia, the following areas:
- public procurement;
 - financial services, products and markets, and prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - transport safety;
 - protection of the environment;
 - radiation protection and nuclear safety;
 - food and feed safety, animal health and welfare;
 - public health;
 - consumer protection;



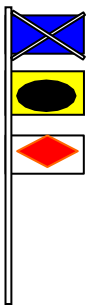
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- D. In handling any report, the Company and the Management Companies shall at all times protect the identity of the reporting person and all parties mentioned in a report and take appropriate measures to ensure that the information contained in a report is not accessible for non-authorized staff members.
- E. By reporting misconduct, the 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.
- F. Failure to report improper behavior may itself consist of a violation of this Policy. Protected Persons have a duty to cooperate with any investigation into known or suspected violations of Company policies or the law.
- G. 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.

4. Submission and Receipt of Reports/Complaints

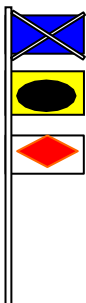
- i. The Reporting System is accessible online via the (hyper)link <https://tenltd.gan-compliance.com/p/Case> which is available on the corporate website. By clicking the above-mentioned link, reporting persons are (re)directed to the "Reporting Portal" platform, where:
- ii. They click on the "CREATE A CASE " link in the middle of the website and then, are (re)directed to Portal's secure web page.
- iii. They indicate the type of the report they intend to submit based on the area that the (potential) breach concerns, namely:
 - 1. **Accounting/Audit Concerns:** Issues related to financial record accuracy, reporting, or auditing practices.
 - 2. **Antitrust or Fair Trading:** Concerns regarding anti-competitive practices, monopolies, or unfair business practices.
 - 3. **Compliance with Laws, Rules, and Regulations:** Ensuring that operations adhere to legal requirements, including local, national, and international laws.
 - 4. **Conflict of Interest:** Situations where personal interests may interfere with professional responsibilities or decision-making.
 - 5. **Corruption or Bribery:** Acts of offering, giving, receiving, or soliciting something of value to influence decisions.
 - 6. **Cyber Security:** Protection of digital systems, networks, and data from cyber threats.
 - 7. **Discrimination:** Unfair treatment of individuals based on race, gender, religion, age, or other protected characteristics.
 - 8. **Environment Issue:** Concerns related to environmental protection, pollution, sustainability, and compliance with environmental laws.
 - 9. **Fraud:** Deliberate deception to secure unfair or unlawful financial gain.
 - 10. **Gifts and Entertainment:** Potentially improper exchanges of gifts or entertainment



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- that may influence decisions or create conflicts of interest.
11. **Harassment:** Unwanted behaviour that creates a hostile or intimidating work environment, including sexual harassment and bullying.
 12. **Health and Safety Concerns:** Issues related to the physical and mental well-being of employees or the public in the workplace or related to business activities.
 13. **Information Security:** Protection of sensitive or confidential information from unauthorized access or breaches.
 14. **Insider Trading:** Illegal trading of a company's stock or other securities by individuals with non-public, material information about the company.
 15. **Intellectual Property:** Concerns related to the protection of patents, trademarks, copyrights, and trade secrets.
 16. **Retaliation:** Adverse actions taken against someone for reporting misconduct or participating in an investigation.
 17. **Theft:** Unauthorized taking or use of company or personal property.
 18. **Money Laundering:** Concealing the origins of money obtained through illegal means by processing it through legitimate businesses.
 19. **Public Procurement:** Issues related to the process of acquiring goods, services, or works from external sources, particularly in government contracts.
 20. **Financial services, products, and markets, and prevention of money laundering and terrorist financing:** Regulatory concerns related to financial services, including measures to prevent illegal activities.
 21. **Product safety and compliance:** Ensuring products meet legal and regulatory standards for safety and quality.
 22. **Transport safety:** Concerns related to the safety of transportation systems and the protection of passengers and goods.
 23. **Protection of the environment:** Activities and policies aimed at preserving natural resources and minimizing environmental impact.
 24. **Radiation protection and nuclear safety:** Ensuring safety measures are in place to protect people and the environment from harmful radiation and nuclear activities.
 25. **Food and feed safety, animal health and welfare:** Concerns related to the safety of food products, animal health, and the ethical treatment of animals.
 26. **Public health:** Efforts to protect and improve the health of populations through disease prevention, health education, and regulatory compliance.
 27. **Consumer protection:** Safeguarding the rights of consumers against unfair practices, defective products, and false advertising.
 28. **Protection of privacy and personal data, and security of network and information systems:** Ensuring personal data is secure and used appropriately, and that network systems are protected from breaches.
 29. **Other:** Any concerns or issues that do not fit into the above categories.
- iv. They select in the relevant field (description of the incident) and submit the report / complaint (anonymously or not).



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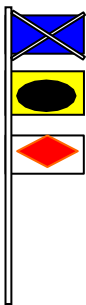
5. **Investigation**

- A. The notification on a new case is automatically sent to the Whistleblowing Officer (WBO) through the reporting platform. Upon the receipt of the report / complaint (the “Complaint”) the WBO 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 behaviors and (ii) when possible, acknowledge receipt of the Complaint within seven (7) working days providing the reporting person with a relevant email .
- B. The WBO examines the content of each Complaint submitted and decides whether it should be filed, or further action is required. When reports are incomprehensible or improperly submitted or do not contain facts constituting a (potential) breach of any applicable Policy and/or Legislation, the WBO files them and then, informs the reporting person thereof. If the reporting persons consider that their rights under the whistleblowing legislation have been breached he or she may resubmit their Complaint to the (Hellenic) National Transparency Authority (NTA)¹.
- C. If the Complaint relates to potentially illegal or unethical behavior or to improper accounting, internal controls or auditing matters, or other financial or business matters, the WBO 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 Protected 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.
- D. The WBO pseudonymises the Complaint submitted by replacing names and any other identifiers (unless considered absolutely necessary for investigation purposes) and forwards it to the Audit Committee. Depending on the act/ behavior reported the WBO might in consultation with the Legal Department forward the report to competent (public) authorities (if necessary).
- E. 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.
- F. The WBO monitors the investigation procedures and communicates with the Audit Committee and/or the competent authorities (where applicable) while maintaining also communication with the reporting person (if known).

6. **Feedback – Provision of Information**

In all cases, the reporting person (if known) will be informed that the incident/(potential) breach was investigated and will be instructed to immediately report any perceived retaliation directly to the WBO. Other information regarding the factual conclusions of the investigation or the disciplinary or remedial action that was taken will be provided to the reporting person by the

¹<https://aead.gr/complaints-eng/>



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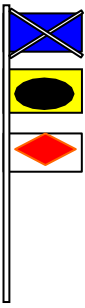
WBO.

The WBO also provides clear and easily accessible information on the procedures under which reports / complaints might be submitted to the NTA and, where appropriate, to public authorities or institutions, bodies, offices, and agencies of the European Union.

7. Treatment of Reports / Complaints

- A. All Complaints shall be filed by the WBO in a digital form.
- B. Although a person making an anonymous report, is advised that maintaining anonymity could hinder an effective investigation, the anonymity of the person making the report shall be maintained until the person concerned indicates that they do not wish to remain anonymous. Any system established for exchanging information with a reporting person shall be designed to maintain anonymity.
- C. If the Audit Committee deems it appropriate, it may engage at the Company's expense independent advisors. In doing so, the Audit Committee shall consider whether using an outside advisor may result in a waiver of the legal privilege. Moreover, the Committee shall consult with the Data Protection Officer (DPO) in connection with the data protection measures that should be implemented as well as the guarantees that should be provided by the independent advisors involved.
- D. In the case of a complaint against the WBO and/or the Audit Committee, the complaint should be marked by the WBO and be immediately forwarded to the National Transparency Authority (NTA).
- E. A copy of any complaint containing evidence/indications of a crime/criminal act prosecuted ex officio², as per the applicable provisions of the Greek Criminal Code, should be immediately forwarded, by the WBO in consultation with the Legal Department, to the competent public prosecutor and the reporting person should be informed thereof.
- F. The Audit Committee or the competent authority (where applicable) shall inform in a timely manner the WBO of any action taken, so that the WBO informs the reporting person (if possible) thereof within a reasonable time frame, which shall not exceed three (3) months from the acknowledgement of receipt of the report submitted.
- G. All Complaints will be taken seriously and will be promptly investigated. The specific action taken in any 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.

² Crimes/ Criminal Acts prosecuted ex officio: crime/ criminal acts that are investigated by the competent prosecution authorities promptly upon becoming relevantly aware.



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8. Anti-Retaliation Policy

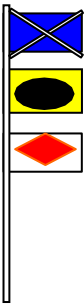
- A. The Company prohibits any form of retaliation against any Protected Person who, in good faith and for lawful purposes, report to the Company any conduct or activity that may violate any law applicable to the Company, to the Management Companies or to their business, any corporate policy or any other suspected improper, unethical, or illegal conduct or activities 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 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.

9. 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 reporting@tenn.gr, or submit a report at <https://tenltd.gan-compliance.com/p/Case>

10. 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 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.



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11. Confidentiality & Personal Data Protection

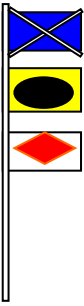
- A. All Complaints shall be handled with the highest level of confidentiality. The WBO is responsible for protecting confidentiality, and where applicable, the anonymity of the reporting person and any third parties mentioned in the complaint, ensuring that unauthorized personnel do not gain access.
- B. The collection and processing of personal data shall be conducted in accordance with applicable Data Protection Legislation. For more details on data protection, please refer to the relevant Privacy Notice.

12. Records Retention

- A. All records related to a Complaint are the property of the Company and shall be retained:
 - a. In accordance with applicable laws and document retention policies;
 - b. Until the conclusion of any investigation or legal proceedings arising from the report involving the subject of the complaint, the reporting individual, or any third parties;
 - c. In a manner that maximizes their utility for the Company's overall compliance program.

13. Compliance with procedures

- A. The Management Companies agree to adhere to the Company's Whistleblowing Policy and will fully cooperate in the investigation and resolution of any violations.



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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.

When the report is submitted via Company's network, TEN may collect 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 Subject (Art.9(2)(e) GDPR).



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5. The processing is necessary for the establishment, exercise or defense 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.

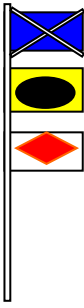
Such sharing or transfers of personal data are adequately safeguarded (e.g., via appropriate contractual clauses, data processing agreements, policies/ rules for intra-Company disclosures of personal data, etc.). Especially when recipients operate outside the EEA, the Company implements appropriate measures, 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.

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.



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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 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 (<https://www.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.