

Anti-Corruption and Anti-Bribery Policy

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Introduction

The Board of Directors (the "Board") of Okeanis Eco Tankers Corp. (together with its subsidiaries, the "Company") has adopted the subject Anti-Corruption and Anti-Bribery Policy (the "Policy") for all of the Company's employees, directors, officers and agents ("Employees"). The Company is committed to establishing a corporate culture where all Employees conduct business in an ethical, fair, honest and transparent manner. The Company through this Policy is willing to comply with all the applicable laws, rules and regulations related to financial crime including, but not limited to, all the anti-bribery laws in areas that the Company conducts business and anti-corruption policies, anti-money laundering and sanctions.

This Policy does not cover all possible violations or every issue that may arise. In general, if an Employee is unsure of what to do in any situation, he or she should ask for guidance from the Board.

Effective date: July 2019

Definitions

"Bribery" for the purpose of this Policy, includes, but is not limited to, the following, whether actually offered or promised or requested;

- cash and cash equivalents of any amount;
- gifts of any value;
- gratuities;
- entertainment; and
- financial or other benefits.

"Gift" means any gift in the form of item or service and at no case in the form of cash or cash equivalents.

"Governmental Personnel" includes, but is not limited to the following;

- official or employee of a government;
- official or employee of a company controlled entity;
- political party or members of a political party;
- official or employee of an international organization; and
- all agents that act on behalf of the above mentioned groups.

"Hospitality" means any hospitality, meal, travel, hotel, tickets to events or any kind of entertainment.

“Third Party Partners” means any entity, company, or individual that acts for or on behalf of the Company. This includes, but not limited to, existing or potential brokers, agents, suppliers, service providers, customers, consultants, or lawyers.

Scope

It is mandatory that all Employees and Third Party Partners are aware of this Policy, comply with it and report any concerns on incidents relating to that Policy.

This policy applies to all Employees and to Third Party Partners, and everyone should be aware. Mechanisms of fraud prevention and reporting and response plan are included in this Policy.

Policy

The Company prohibits all of its Employees and Third Party Partners from, directly or indirectly, offering, giving, proposing, promising or asking for a bribe in order to establish or retain any business or personal advantage. Bribery can also be part of a payment made for a good or service, a portion of which may be intended to artificially increase the value of that good or service.

Decisions by the Company and its Employees relating to the procurement and provision of goods and services should always be free from even the perception that favorable treatment was sought, received or given as a result of bribery.

Employees should never solicit a gift, hospitality or any favor from those with whom the Company does business. However, gifts and hospitality that are often considered a customary business courtesy may in some cases be bribery. Any gift or hospitality should be judged carefully before acceptance in order to avoid any conflict of interest or violation of this Policy. Frequent giving or receipt of gifts and hospitality is considered a violation of the Policy.

Gifts or hospitality of value more than USD 200 can only be accepted by an Employee after the approval of his/her immediate supervisor.

It is also prohibited for Employees or Third Party Partners who act for or on behalf of the Company to bribe governmental personnel in order to establish or retain business advantage.

Record Keeping

The Company should keep financial records and have appropriate internal controls in place, which will fairly reflect evidence of business transactions and activities. All records shall be accurately recorded, with sufficient accompanying details and full transparency.

The Company has established an internal control system that provides further assurance that all applicable International Financial Reporting Standards are followed and that all actions to prevent violations of this Policy are in place.

Accounts, invoices, and any kind of supporting documentation relating to a gift or hospitality should be maintained with strict accuracy and completeness.

No transactions can be kept off the Company's official records, and no supporting documentation kept in places other than the one for all the entries.

Reporting

All Employees are required to read and understand the Code, comply with its provisions and report any suspected violations through the Whistleblower Policy. If someone receives or is asked to make a bribe, he/she should immediately report it as per the Whistleblower Policy.

Every manager and/or director is also responsible for administering the Policy as it applies to Employees and operations within each ones area of supervision.

Penalties

Failure to comply with the guidelines stated in this Policy will lead to disciplinary actions. In case of an Employee, the disciplinary action may lead to the termination of his/her contract of employment with the Company. In case of a Third Party Partner, their co-operation with the Company will be suspended indefinitely and all outstanding payments will be withheld.