# **Slavery and Human Trafficking Statement**

# **Contents**

Introduction	3
Organisational Structure, Business and Supply Chains	3
Policy	3
Due Diligence	4
Risky Areas	4
Slavery Confrontation	5
Training	5

#### Introduction

The Board of Directors (the "Board") of Okeanis Eco Tankers Corp. (together with its subsidiaries, the "Company") has approved the subject Slavery and Human Trafficking Statement (the "Statement"). This Statement is prepared pursuant to the UK Modern Slavery Act 2015 (the "Slavery Act") section 54 (1).

Approved on: July 2019

## **Organisational Structure, Business and Supply Chains**

The Company is a newly established international tanker company in the crude oil transportation industry. The Company owns a fleet of fifteen tanker vessels. The sailing fleet consists of three modern LR2 Aframax tankers, four modern Suezmax tankers and three modern VLCCs, while the newbuilding fleet consists of five VLCC tankers. The Company is focused on "future proof" vessels built to ECO standards that consume less bunker fuel than conventional tanker vessels, being equipped (or to be retrofitted) with exhaust gas cleaning systems ("scrubbers"), being built to comply with regulations for ballast water treatment.

The vessels of the Company are technically managed by a related party management company, Kyklades Maritime Corporation (the "Kyklades"). Kyklades has aligned interests with the Company to promote the same corporate culture of honest and ethical business conduct.

The Company is part of an international supply chain, providing services in crude oil transportation worldwide. The Company and the Company's vessels conduct business with various international Business Partners providing goods or services to the Company or its vessels.

"Business Partners" for the purpose of this statement includes, but is not limited to, agents, suppliers, service provides, crew agencies, guards, bunker suppliers, freight forwarders, scrap yards and newbuilding yards.

## **Policy**

The Company is committed to establishing a corporate culture to conduct business in an ethical, fair, honest and transparent manner. The Company through this Statement intends to emphasize the importance of preventing any kind of Slavery violations and that no violation took place in any of the supply chains that the Company is involved in.

In 2016 the Company was certified to be compliant with the Maritime Labour Convention, 2006 (the "MLC"). MLC is an international labour convention adopted by the International Labour Organization (the "ILO"). It provides international standards for shipping as it is a genuinely global industry. The MLC was adopted by government, employer and worker representatives at a special ILO conference in February 2006 with the aim of establishing decent work conditions for seafarers, and to secure economic interests through fair competition for quality ship owners. The MLC sets out, in one place, seafarers' right to decent working conditions and covers almost every aspect of their work and life on board vessels. The main areas are the following;

- a safe and secure workplace that complies with safety standards;
- fair terms of employment;
- decent working and living conditions on board vessel; and
- health protection, medical care, welfare measures and other forms of social protection.

"Slavery" for the purpose of this Statement refers to slavery, servitude, forced or compulsory labour, human trafficking or the intention to commit any of the afore mentioned offences. More detailed, human trafficking is considered when a person arranges or facilitates the travel of another person with a view to the other person being exploited. It is irrelevant whether the other person (adult or child) consents to the travel.

## **Due Diligence**

The Company's and Kyklades's shore-based and sea-going staff are alerted to check and report at all times any violations on Slavery or human trafficking before entering into any transaction or while in a transaction with any Business Partner or other entities or individuals met in the supply chain that the Company operates in.

In areas with high risk, further due diligence is performed prior to entering into any agreement or transaction. Before a Business Partner is granted entry onto the approved list of suppliers, various checks are performed, one of them being their compliance with the Slavery Act.

#### **Risky Areas**

The Company through its due diligence procedures mentioned above is highly cautious, especially when it comes to risky areas or risky industries. On an annual basis and prior to approval of the Statement, evaluation of risky areas and businesses is performed by both the Company and Kyklades.

The Company recognizes and is aware of the inherent risk in certain geographic areas (especially developing countries) and in certain business activities, such as shipyards and scrap yards.

## **Slavery Confrontation**

The Company, through the Code of Business Conduct and Ethics (the "Code"), prevents illegal or dishonest behavior and promotes honest and ethical business conduct, including the ethical handling in terms of conflicts of interest between personal and professional relationships as well as Business Partners in the supply chain. The Code outlines the ethical principles that are to govern the decisions and behavior of the Company's Employees and is designed to help Employees conduct business honestly, respectfully and with integrity.

As part of this Code and within the overall attempt to conduct business in an honest and ethical way, and to comfort any incidents or violations of Slavery, the Company has adopted a Whistleblower Policy to offer Employees a pathway through which they can raise concerns without fear of retaliation for reports made in good faith.

### **Training**

The Company and Kyklades provides training for all of their Employees, both shore-based employees and seafarers. Training courses take place at least once a year unless there is a change in the policies of the Company related to Slavery or the methods to report, and to ensure that there are no Slavery incidents.

Ioannis Alafouzos

Chairman and CEO

Okeanis Eco Tankers Corp.

July 9, 2019