

OKEANIS ECO TANKERS CORP.

Code of Business Conduct and Ethics

Effective: December 6, 2023

1. Purpose and Scope

The Board of Directors of Okeanis Eco Tankers Corp. (the “**Company**”) has adopted this Code of Business Conduct and Ethics (this “**Code**”), which applies to all employees, directors, officers and certain long-term consultants of the Company and its subsidiaries, in addition to employees, directors, officers and long-term consultants of the Company, in addition to certain employees of the Company’s technical ship manager (each such person, an “**Employee**”).

The Code is intended to:

- promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the U.S. Securities and Exchange Commission (the “**SEC**”), the Oslo Stock Exchange or the Norwegian Financial Supervisory Authority, as well as in other public communications made by or on behalf of the Company;
- promote the protection of Company assets, including corporate opportunities and confidential information;
- promote compliance with applicable governmental laws, rules, and regulations;
- deter wrongdoing; and
- require prompt internal reporting of breaches and accountability for adherence to this Code.

All Employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below in the section entitled “Internal Reporting, Anti-Retaliation and Whistleblower Policy”.

2. Conflicts of Interest and Corporate Opportunities

A conflict of interest occurs when an Employee’s private interests interfere, or even appear to interfere, with the interests of the Company. While it is not possible to describe every situation in which a conflict of interest may arise, Employees must never use or attempt to use their position with the Company to obtain improper personal benefits. Any Employee who is aware of a conflict of interest, or is concerned that a conflict might develop, should immediately discuss the matter

with the Chairman of the Audit Committee of the Board of Directors of the Company or the responsible partner at the Company's outside counsel.

Employees owe a duty to advance the legitimate interests of the Company when the opportunities to do so arise. Employees shall neither compete with the Company nor shall they take personal advantage of business opportunities that are discovered through the use of corporate property, information or position during the course of their employment. Employees may not use the Company's assets, property, information, or position for personal gain.

3. Confidential and Non-Public Information, Personal Data Privacy

It is important that Employees protect the confidentiality of the Company's information. Employees may have access to proprietary and confidential information concerning the Company (including its customers, suppliers, joint venture partners, employees, advisors and consultants). For purposes of this Code, confidential information is all non-public information entrusted to or obtained by an Employee, including, *but not limited to*, non-public information that might be of use to competitors or harmful to the Company (including its customers, suppliers, joint venture partners, employees, advisors and/or consultants) if disclosed, and non-public information concerning the business, financial results and prospects, and potential corporate transactions of the Company (including its customers, suppliers, joint venture partners, employees, advisors and/or consultants).

Employees are required to keep such information confidential during employment as well as thereafter, and not to use, disclose, or communicate that confidential information, except when disclosure is expressly authorized or is required by law. The consequences to the Company and the Employee concerned can be severe where there is unauthorized disclosure of any non-public, privileged or proprietary information.

To ensure the confidentiality of any personal information collected and to comply with applicable laws, regulations and internal policies, any Employee in possession of non-public, personal information about the Company's customers, suppliers, joint venture partners, employees, advisors, and consultants must maintain the highest degree of confidentiality and must not disclose any personal information unless authorization is first obtained from the Board or a committee thereof.

The Company respects and takes seriously the protection of the personal data of all natural persons who use the Company's facilities, services and websites. The Company also strives to take all reasonable technical and organizational measures required to protect the personal data it collects and processes.

The restriction on disclosing confidential information is not intended to prevent any Employee from reporting to the Company's senior management or directors, a government body or a regulator, concerns of any known or suspected violation of this Code, or to prevent any Employee from reporting retaliation for reporting such concerns. It is also not this Code's intention to prevent any Employee from responding truthfully to questions or requests from a government body, a regulator or as required by applicable law.

4. Honest and Fair Dealing

It is the Company's longstanding policy to conduct its business fairly and honestly at all times in accordance with the highest ethical standards. Employees must endeavor to deal honestly, ethically and fairly with the Company's customers, suppliers, service providers, competitors, investors, and employees. No Employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unethical practice. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct. Further, no Employee may take, directly or indirectly, any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors in the performance of their audit or review of the Company's financial statements.

5. Protection and Proper Use of Company Assets

The Company's assets are to be used only for legitimate business purposes and only by authorized Employees or their designees. This applies to both tangible assets (such as office equipment, telephone, copy machines, etc.) and intangible assets (such as trade secrets and confidential information). Employees have a responsibility to protect the Company's assets from theft and loss and to ensure their efficient use. Theft, carelessness and waste directly impact on the Company's profitability. If you become aware of theft, waste or misuse of the Company's assets you should report it to your manager or the Board.

6. Compliance with Laws, Rules and Regulations

It is the Company's policy to comply with all applicable laws, rules and regulations. Additionally, it is the personal responsibility of each Employee to adhere to the standards and restrictions imposed by applicable laws, rules and regulations, and in particular, those relating to accounting and auditing matters. If you are unsure whether a situation violates any applicable law, rule, or regulation, you should contact the responsible partner at the Company's outside legal counsel. All Employees that become aware of such behavior or are concerned that such a behavior might have an impact on the Company's assets or property and consequently to the Company's profitability, should report the same to their immediate supervisor or the Board.

7. Modern Slavery and Child Labor

The Company has a zero-tolerance approach towards any form of slavery, child labor, forced labor or human trafficking and views any form of slavery, servitude, human trafficking child or forced labor as serious crimes and a violation of fundamental human rights. The Company recognizes that it has a social responsibility to take a robust approach against modern slavery and human trafficking, and is committed to ensuring that there are no such acts of modern slavery within its own business or knowingly within its supply chains. In addition, the Company is committed to assuring full compliance with applicable laws, regulations and relevant collective agreements concerning working hours and overtime, leave and minimum rest periods. The Company adheres to international labor standards and internationally recognized human rights addressing working conditions.

The Company is committed to the abolition of child labor within its sphere of influence. As such, we do not engage in and condone the unlawful employment or exploitation of children. Furthermore, the Company does not and will not use any form of forced or involuntary labor, and refrains from practices that can give rise to a risk of involuntary labor. Any actual or potential instances of modern slavery should be reported to the Chairman of the Company's Audit Committee or the responsible partner at the Company's outside legal counsel.

8. Health and Safety; Environmental Compliance

The Company strives to provide its Employees with a safe and healthy work environment. Each Employee has the responsibility to maintain a safe and healthy workplace for all Employees by following all applicable health and safety rules, regulations, laws and Company policies and procedures carefully, and by reporting accidents, injuries and unsafe equipment, practices or conditions. Threats or acts of violence and physical intimidation are not permitted.

The Company prohibits the illegal use, sale, purchase, transfer, possession or consumption of controlled substances, other than medically prescribed drugs, while on the Company premises or working. Company policy also prohibits the use, sale, purchase, transfer or possession of alcoholic beverages by Employees while on Company premises, except as authorized by the Company. This policy requires the Company to abide by applicable laws and regulations relative to the use of controlled substances. The Company, in its discretion, reserves the right to randomly test Employees for the use of alcohol or other controlled substances unless prohibited by prevailing local law. Any Employee found in violation of this prohibition, or refusing to take a random controlled substance test that is permitted by applicable law, is subject to immediate termination.

Furthermore, it is the Company's policy to operate its business and its vessels in accordance with all applicable safety and environmental laws and regulations so as to ensure the protection of the environment and the Company's personnel and property and minimize adverse environmental effects. To this end, the Company is committed to:

- complying with all applicable local and national environmental treaties, laws and regulations as well as international standards;
- developing, implementing and maintaining effective management and operational systems, including through digitalization and process engineering, that support identifying risks, measuring and monitoring performance, and driving continual improvements to maximize efficiency and mitigate or minimize adverse environmental impacts resulting from its operations, to achieve safe, sustainable and environmentally sound performance; and
- proactively promoting environmentally friendly technologies, processes and other initiatives with respect to its operations to protect and respect the environment and with a view toward reducing the environmental impact of its operations.

9. Freedom from Discrimination and Harassment

The Company is committed to creating and maintaining an environment where all individuals are free from discrimination or harassment and bullying, by providing a working environment free from discrimination against staff on the basis of sex or sexual orientation, race (which includes color, nationality, ethnic or national origin), marital or civil partner status, gender reassignment, religion or belief, disability, age, political or ideological affiliation, and pregnancy or maternity/paternity. The Company firmly observes equal employment opportunities by ensuring that all aspects of hiring and employment practices are based on the grounds of merit and work-related abilities. Discrimination, harassment and bullying are violations of this Code and may also expose the Company and any employee guilty of such behaviors to sanction and/or reputational risk. In case an Employee observes such harassment or suspects as much, he/she should report it immediately to his/her immediate supervisor or to the Board. The Company does not tolerate discrimination of any kind and complaints of discrimination, harassment and bullying will be investigated promptly, sensitively and confidentially. Any violation of this policy will lead to disciplinary action.

This policy governs all aspects of employment and applications related to employment including, selection, promotions, rewards, wages, overtime, working hours, leave, benefits, access to training, job assignment, social benefits, corrective and disciplinary actions, termination of employment or retirement.

10. Diversity, Equity and Inclusion

The Company is committed to diversity and inclusion among its workforce and eliminating unlawful discrimination. The aim is for its workforce to be representative of all sections of society, and for each Employee to feel respected and valued.

The Company aims to create a motivational, inclusive, and safe work environment by providing:

- equal opportunities for career enhancement and advancement;
- fair remuneration in accordance with expertise, experience, and responsibilities;
- continuous training and development;
- access to medical care and psychological support; and
- wellness initiatives on board vessels.

The Company strives to build and sustain a diverse workforce and an inclusive workplace in which employees can reach their highest potential in an environment of equal opportunities, mutual respect, and ethical behavior.

The Company makes opportunities for training, development and progress available to all Employees, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilized to maximize the efficiency of the Company.

11. Anti-Bribery, Anti-Corruption, and Anti-Fraud

For purposes of this Code:

“**Bribery**” is a criminal and corrupt practice where a person or entity offers, promises, gives, accepts or solicitates an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust in exchange for a benefit. Active bribery occurs when an individual offer, pays, agrees to pay, or attempts to pay a bribe. Passive bribe occurs when an individual request, receives, agrees to receive, or attempts to receive a bribe.

“**Corruption**” is a dishonest activity in which a director, executive, manager, employee, or contractor of an entity acts contrary to the interests of the entity and abuses their position of trust to achieve some personal gain or advantage for themselves or for another person or entity. Corruption includes any unlawful, unethical, or improper action or breach of trust undertaken for personal, commercial, or financial gain.

“**Fraud**” means a dishonest activity, causing actual or potential financial loss to any person or entity, including the theft of money or other property by employees or persons external to the entity and where deception is used at the time, immediately before, or immediately following the activity. It also includes the deliberate falsification, concealment, destruction, or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.

It is the Company’s intention and obligation to comply with the anti-corruption laws of the countries in which it does business, including the U.S. Foreign Corrupt Practices Act of 1977, as amended, and the U.K. Bribery Act 2010, among other anti-corruption laws. The Company is committed to combatting all forms of corruption and Employees are expected to act in a manner that will enhance the Company’s reputation for honesty, integrity and reliability. As such, Employees are prohibited from attempting to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal, or harmful to our reputation of honesty and integrity. Offering, promising, authorizing, making, soliciting or accepting, directly or indirectly through a third party (for example, a government official, commercial agent or shipping agent), anything of value, monetary or otherwise (including gifts and other favors), to any government official or private person for the purpose of improperly obtaining or retaining business is strictly prohibited. This includes, without limitation, any gift, forgiveness, loan, favor or service, or gratuity or special discount.

Employees must have, and be seen to have, the highest standards of honesty, propriety and integrity in the exercise of their duties. They are responsible for reporting any suspected fraud, impropriety, or other dishonest activity immediately and to assist in the investigation of any suspected fraud.

The Company expects that its suppliers, customers, service providers, and partners shall not engage in any form of corrupt practices, including extortion, fraud, bribery, corruption payments, and money laundering, whether directly or indirectly.

12. Anti-Money Laundering

The Company forbids facilitating or engaging in transactions that result in the diversion of funds for money laundering. If Employees suspect fraudulent activity or activity that may be related to money laundering, they must report their suspicions. Money Laundering is defined as the process of converting illegal funds in such a manner as to make the funds appear to be derived from legitimate sources. To avoid unwillingly financing terrorism, narcotics, and other illicit activities, we require full transparency of payments and the identity of parties involved in transactions. The Company has KYC (know-your-customer) processes to prevent restricted payments and financial transactions. The Company expects full cooperation from the Employees in assisting law enforcement agencies in their efforts to prevent and prosecute money laundering.

13. Securities Trading

As a public company, the Company is subject to a number of laws concerning the sale and purchase of its shares and other publicly traded securities. Company policy prohibits Employees and their family members from trading securities while in possession of material, non-public information relating to the Company or any other company, including a customer or supplier that has a significant relationship with the Company. Information is “material” when there is a substantial likelihood that a reasonable investor would consider the information important in deciding whether to buy, hold or sell securities. In short, any information that could reasonably affect the price of securities is material. Employees, and any other person that possesses “Inside Information”, which is defined in Article 7 of Regulation (EU) No. 596/2014 on market abuse (“**MAR**”) as “information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments;”, are also by law restricted from trading, directly or indirectly, for its own account or for the account of a third party, in the Company’s shares or other financial instruments to which the Inside Information relates.

Information is considered to be “public” only when it has been released to the public through appropriate channels and enough time has elapsed to permit the investment market to absorb and evaluate the information. If an Employee’s and/or any of their family members have any doubt as to whether they possess material nonpublic information or Inside Information, they should contact either the Chief Executive Officer or the Chief Financial Officer of the Company, and the advice of legal counsel may be sought.

The Company has adopted certain rules and procedures governing trading of the Company’s securities by certain Employees and other insiders/primary insiders (PDMRs) and their close associates that must be complied with at all times.

14. Political Activities

Laws in many jurisdictions prohibit entities from contributing to political candidates. Where such contributions are illegal by law, the Company forbids direct contribution to political campaigns. Employees are forbidden from using Company funds or resources to support such political campaigns or candidates without Board approval. Company's resources include, but is not limited to, facilities, supplies, telephones and other assets. Employees who hold or seek to hold political office are only allowed to do so on their own time, whether it is during vacation, unpaid leave, after work hours or weekends. Approval should be obtained from the Chief Executive Officer or Chief Financial Officer (and in the case of the Chief Executive Officer or Chief Financial Officer holding or seeking to hold office, from the Board) in order to be allowed to do so. Conflicts of interest and proper use of Company's corporate assets should be ensured.

15. Disclosure

Certain Employees are responsible for ensuring that the disclosure in the Company's periodic reports is full, fair, accurate, timely and understandable. In doing so, such Employees shall take such action as is reasonably appropriate to: (i) establish and comply with disclosure controls and procedures and accounting and financial controls that are designed to ensure that material information relating to the Company is made known to them; (ii) confirm that the Company's periodic reports comply with applicable law, rules and regulations; and (iii) ensure that information contained in the Company's periodic reports fairly presents in all material respects the financial condition and results of operations of the Company. Employees will not knowingly: (i) make, or permit or direct another to make, materially false or misleading entries in the Company's, or any of its subsidiaries', financial statements or records; (ii) fail to correct materially false and misleading financial statements or records; (iii) sign, or permit another to sign, a document containing materially false and misleading information; or (iv) falsely respond, or fail to respond, to specific inquiries of the Company's independent auditor or outside legal counsel.

16. External Communications Policy; Use of Social Media

The Company is committed to providing accurate and appropriate messaging to external stakeholders. As such, all Employees should be polite and courteous when in the course of business as a representative of the Company. Unless expressly permitted by senior management of the Company, all press releases, publications, or dissemination of corporate logos and copyrighted digital representations of corporate assets are to be handled by senior management or duly appointed representatives of the Company. Anyone contacted by media or other organizations seeking commentary or an official response by the Company should seek guidance from senior management. Providing an unapproved response to third parties may be cause for discipline, up to and including, termination as it may irreparably damage our corporate reputation or shareholder value.

The Company understands the popularity of social media and the frequency of its use by its Employees. While these tools may be an effective way of positively marketing the Company and providing real value, these sites may also be damaging to the Company's corporate reputation if used improperly. The official accounts of the Company will be maintained by senior management or duly appointed representatives of the Company. Social media extends to any group

form of communication such as forums, discussion groups, YouTube channels, and chat rooms. In certain circumstances, Employees may post items regarding the Company on personal accounts (charity work, pictures at sea, etc.) but should take great care when deciding to mention the organization in personal posts.

17. Procedures Regarding Waivers

Because of the importance of the matters involved in this Code, waivers will be granted only in limited circumstances and where such circumstances would support a waiver. Waivers of the Code may only be made by the Audit Committee and will be disclosed by the Company.

18. Internal Reporting, Anti-Retaliation and Whistleblower Policy

Scope and Purpose

This Internal Reporting, Anti-Retaliation and Whistleblower Policy outlines the procedures and protections provided by the Company to facilitate the reporting of ethical, legal, or accounting concerns by its Employees. It is the Company's commitment to uphold the highest standards of integrity, compliance with applicable laws, regulations, accounting standards, internal controls, audit procedures, and its own policies as well as offer a pathway through which they can raise concerns without fear of retaliation for reports made in good faith.

Employees shall take all appropriate action to stop any known misconduct by fellow Employees or other Company personnel that violate this Code. Employees shall report any known or suspected misconduct to the Chairman of the Audit Committee or the responsible partner at the Company's outside legal counsel. This requirement of all Employees is designed to provide a channel of communication for Employees and others who have concerns about the conduct of the Company or any of its Employees, including with respect to the Company's accounting controls or auditing matters. The Company will not retaliate or allow retaliation for reports made in good faith.

Reporting Mechanism

(1) Direct Reporting to Supervisors/Managers: Employees, at first instance, are encouraged to communicate their concerns regarding any questionable matters, ethical lapses, legal violations or accounting irregularities to their supervisor/manager. The Company fosters an open and supportive environment for such discussions.

(2) Website Submission: If the Employee does not feel comfortable to communicate the complaint to his or her supervisor/manager or that his or her supervisor/manager has taken no remedial action, he or she is encouraged to submit the complaint via the Whistleblower section of the Company's website at www.okeanisecotankers.com/whistleblower.

Complaints submitted through Company's website will be received by the Chairman of the Audit Committee and the responsible partner at the Company's outside legal counsel. If the

complaint involves the Audit Committee or any of its members, it may be submitted to the Chief Executive Officer of the Company.

(3) Email or Mail: Reports can be submitted in writing by email to the Company's internal legal counsel at legal@okeanisecotankers.com or by mail to the Company's address:

c/o OET Chartering Inc. Company,
Ethnarchou Makariou av, & 2 D. Falireos str.
185 47 N. Faliro, Greece
Attn. Chief Financial Officer

Regardless of the recipient, complainants are encouraged to provide as many details as possible to facilitate a thorough and effective investigation. In case the complaint is submitted by an Employee in a non-anonymous way, he or she may be asked to assist with the investigation or provide additional details.

Investigation Process

Upon receipt of an allegation or complaint, the Chairman of the Audit Committee will conduct a preliminary investigation in order to determine its significance and whether it involves potential violations of legal regulations, Company policies, improper accounting, internal controls, auditing issues, financial or business-related issues, or unethical behavior. Following the preliminary investigation, the complaint will be presented to the Audit Committee for a collective decision on whether to proceed with a further investigation or to engage external advisors. The Chairman of the Audit Committee will then inform the Chief Executive Officer and the Chief Financial Officer of the Company to determine the subsequent actions.

Confidential Reporting

It is recommended that Employees filing a complaint provide their name to assist with the investigation. However, it is at the Employee's sole discretion whether the Employee wishes to file the complaint anonymously or not.

Any anonymous or non-anonymous complaint will be treated with the utmost confidentiality. The identity of the person making the complaint will not be disclosed to fellow Employees or other Company personnel and shall be kept confidential unless it is necessary for the investigation or required by the applicable laws, rules or regulations.

The Company strictly prohibits any retaliation and will not take any adverse actions, including discharge, demotion, threats, suspension, or discrimination, against any Employee who files a complaint in good faith.