

STEALTHGAS INC.

ANTI-MONEY LAUNDERING POLICY

1. POLICY

This Anti-Money Laundering Policy (the “Policy”) applies to all directors, officers, contractors, and offshore and onshore employees of (1) StealthGas Inc. and its subsidiaries and other business entities controlled by it (collectively, the “Company”); (2) affiliates and entities that regularly provide management services to the Company, including but not limited to Stealth Maritime Corporation S.A. and Brave Maritime Corporation Inc. (the “Management Companies”); and (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”) (collectively, the Company, the Management Companies, and Third Parties are referred to as “Covered Persons”).

This Policy requires all Covered Persons to comply fully with all applicable anti-money laundering laws and regulations and to actively take steps to prevent any activity that directly or indirectly facilitates money laundering and/or the funding of illegal or terrorism-related activity. Applicable anti-money laundering laws and regulations include not only those of the countries in which a Covered Person is domiciled but also those of the countries in which a Covered Person conducts business.

Compliance with anti-money laundering policies and procedures is an ongoing responsibility of each Covered Person.

2. DEFINITION

Money laundering is the act of disguising illegally derived funds as legitimate payments and receipts. Money laundering can occur by means of overpayments, underpayments or payments for goods or services that are not provided. Accordingly, Covered Persons should closely monitor payments, receipts, and other financial transactions for any suspicious activity.

3. REQUIREMENTS

No Covered Person shall engage in or authorize, approve, or condone any activity that violates any applicable anti-money laundering laws and regulations or that directly or indirectly facilitates money laundering and/or the funding of terrorism or criminal activity.

The following is a non-exhaustive list of examples of “red flags,” which are indicative of potential money laundering activity:

- An invoice or payment that lacks a business purpose or is inconsistent with business activities or the amount of goods or services that have been provided.
- Payments that are made in currencies other than that specified in the invoice and/or contract and/or purchase order.

- A receipt or payment that is larger in amount than the amount that is actually due or payable.
- A payer or payee that refuses or is unable to explain the difference in the amount that was received or paid versus the amount that was due or payable.
- A payer or a payee that refuses to reveal information concerning its business activities.
- Any transaction where the basic details of the parties cannot be checked or verified. Information provided by a payer or payee that appears false, misleading, or incomplete.
- Transactions performed through unknown or unnecessary intermediaries and/or transactions that are accompanied with a request for secrecy.
- Sizable cash payments or attempts to receive or make payments in cash or equivalents (i.e. cash cheques).
- Transactions related to, or including accounts located in, high risk countries as listed by international authorities, including but not limited to the European Commission and the Financial Action Task Force.
- Transactions that appear intended to evade tax requirements in any country and/or local jurisdiction.

Any Covered Person who has knowledge or reason to suspect or believe that a violation of any anti-money laundering laws has occurred or is about to occur shall report such information in a timely fashion in any of the following ways:

- Contact your manager.
- Call the Ethics Hotline on + 30 210 62 500 17 and leave a voice message with the answering service.
- Email the Internal Auditor at pyndiah@stealth.gr
- Email the Audit Committee at AuditCommittee@stealthgas.com.

All such reports shall be treated confidentially to the extent permitted by law.

Covered Persons have a duty to cooperate with any investigation into known or suspected violations of this Policy or any anti-money laundering law.

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.

Any questions regarding this policy should be directed to the Audit Committee at AuditCommittee@stealthgas.com.