



HUMAN RIGHTS POLICY

THE NAVIGATOR COMPANY, S.A.



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I. VERSION HISTORY

VERSION	ELABORATION	DATE OF APPROVAL	APROVAL	COMMENTS
1	Compliance area	16/12/2022	Board of Director	Initial Emission



1. RESPECT FOR HUMAN AND LABOR RIGHTS

The Navigator Company assumes the importance of respecting human rights and labor rights as an integral part of its overall business development, in accordance with the principles established in the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, the Fundamental Conventions of the International Labor Organization and the United Nations Guiding Principles on Business and Human Rights.

2. COMMITMENTS TO HUMAN AND LABOR RIGHTS

In line with the principles established in the Code of Ethics and Conduct and in recognition of the respect for human and labor rights expressed in this policy, The Navigator Company is committed, namely, to the following:

- a)** To reject any discriminatory action towards Employees or any other persons, namely based on race, religion, gender, sexual orientation, ancestry, age, language, place of origin, political or ideological beliefs, economic situation, social context, or contractual relationship, fostering respect for human dignity as one of the fundamental principles of the culture and policy pursued by The Navigator Company.
- b)** To value diversity, gender equity and inclusion, to effectively ensure equal opportunities in the workplace, including migrant workers and people with disabilities.
- c)** Provide access to decent employment, guaranteeing employees a safe and healthy working environment, fair and equitable remuneration, their personal development and continuous training, the privacy of their personal data, respect for rest times, access to applicable social protection schemes and respect for the right to parenthood and encouraging the conciliation between professional, family, and personal life.
- d)** Never employ child or forced labor or other forms of modern slavery, nor collude with such practices, rejecting that anyone may be forced to work by means of force or under any form of coercion.
- e)** Prevent harassment in any form in the work environment, acting against any behavior or act that has the purpose or effect of humiliating, intimidating, or threatening and promoting dignity and respect for human beings in the work context.
- f)** Promote the involvement of the various relevant stakeholders, in particular the communities in which The Navigator Company operates, to obtain feedback on human and labor rights issues, recognizing the importance of listening to them and of ongoing dialogue to integrate their concerns in internal decision-making processes.
- g)** Respect the human rights of local communities, including, where applicable, indigenous peoples, namely by taking measures to minimize the negative impact of their activities and by protecting their values, culture and traditions.
- h)** Respect the freedom of association of workers and the importance of maintaining a constructive and beneficial dialogue with such entities for the enhancement of the working environment.
- i)** Encourage the different levels of The Navigator Company's value chains to observe human rights and labor rights, namely through adequate contractual standards that encourage the adoption of the necessary preventive and corrective measures and the transparent treatment of information regarding possible violations of human or labor rights, as well as the evaluation of their compliance in these matters.



- j)** Promote measures to identify the main impacts and potential risks of the company's activity with respect to human rights, namely through the due diligence procedures considered appropriate.
- k)** Stimulate the integration of this policy in the corporate culture, through training actions for employees in matters of human rights and labor rights.
- l)** Encourage transparency in matters of human rights and labor rights, including through the annual disclosure of relevant aspects of its performance and the respective internal monitoring, as well as the communication, through the channel made available for this purpose, of any situations of non-compliance with this policy that are identified by employees or third parties, with a view to enabling continuous improvement of the company's performance in these matters.
- m)** Adopt measures to resolve and remedy any situations of non-compliance appropriate to observe the principles established in number 1 and in this number.
- n)** Recognize the importance of observing the principles set forth in paragraph 1 even in countries where local legal standards do not reflect those principles.

3. GOVERNANCE MODEL

- 3.1.** The Navigator Company's human rights policy is defined by the company's Board of Directors, which is also responsible for monitoring the annual planning of measures for its promotion and compliance.
- 3.2.** The Company's Executive Committee determines the measures for promotion and compliance with this policy and the resolution or remedy of any non-conformities which may be identified, as well as the transparent treatment of the information, namely through the respective disclosure in the annual management report.
- 3.3.** The Corporate Governance Committee and the Ethics Committee monitor, within the scope of their respective functions, the implementation of this policy.
- 3.4.** The responsibility matrix associated to the governance model of The Navigator Company Group's human rights policy is the one presented in the figure below.



Activities	Compliance Area	Board of Directors	Executive Committee	Corporate Governance and Ethics Committees	Legal, Compliance and Public Affairs Department	Human Resources Department	Sustainability Department	Areas with procurement and acquisitions functions	All Department/Areas
Respect for human and labor rights (article 1)	C	I	A	I	C	C	C	N.a.	R
Non-discriminatory treatment (article 2.a)	C	I	A	I	C	C	C	N.a.	R
Dignified work (article 2.b)	C	I	A	I	C	R	C	N.a.	C
Rejection of modern slavery (article 2.c)	C	I	A	I	C	R	C	C	C
Prohibition of harassment (article 2.d)	C	I	A	I	C	C	C	N.a.	R
Equal opportunities (article 2.e)	C	I	A	I	C	R	C	N.a.	C
Involvement of stakeholders (article 2.f)	C	I	A	I	R	C	C	C	C
Local communities (Article 2.g)	C	I	A	I	C	C	R	C	C
Freedom of Association (article 2.h)	C	I	A	I	C	R	N.a.	N.a.	C
Value chains (Article 2.i)	C	I	A	I	C	C	C	R	C
Monitoring, integration and communication measures (Article 2.j, k and l)	R	I	A	I	C	C	C	C	C
Resolution and Remedial Measures (art. 2.m and 3.2)	C	A	R	I	C	C	C	C	C

R (*Responsible*) – unit or area responsible for the execution and success of the activity

A (*Accountable*) – approving body, unit or area or responsible for the final validation of the activity

C (*Consulted*) – unit or area consulted to present comments, suggestions or recommendations on the activity and its execution

I (*Informed*) – unit or area informed about the activity and its execution

4. SCOPE

This human rights policy is applicable to all business units, companies in a control or group relationship and other participated entities, regardless of their legal nature, in which The Navigator Company has management control or majority ownership of the respective share capital, covering all countries in which it operates.



5. PERIODIC REVIEW

- 5.1.** This policy is subject to regular review to verify its adequacy to The Navigator Company's governance structure, applicable legal requirements and generally accepted best practices on human rights, at intervals not exceeding 2 years.
- 5.2.** The Compliance Area of The Navigator Company ensures periodic monitoring and review of this policy.

6. PREPARATORY PROCESS, VALIDITY, ENFORCEMENT AND OTHER PROVISIONS

- 6.1.** The preparatory process of this policy was developed with the support of an external team specialized in human rights and labor rights and with the participation of an internal multidisciplinary team from different geographies.
- 6.2.** This policy was approved by the Board of Directors on 16 of December 2022, at the proposal of the Executive Committee and after hearing the Audit Board, the Corporate Governance Committee, and the Ethics Committee, coming into force in The Navigator Company as of 16 of December 2022.
- 6.3.** For clarification of doubts about the interpretation or application of this policy, the Compliance Area shall be consulted.
- 6.4.** The processing of personal data resulting from the application of this policy shall comply with the provisions of the internal rules regarding the protection of personal data in The Navigator Company.