

CODE OF GOOD CONDUCT FOR PREVENTING AND COMBATING HARASSMENT AT WORK

The rules and procedures currently in force in The Navigator Company, S.A. (hereinafter "Navigator") require that the behaviour of their employees be guided by rules that require high standards of professional conduct.

In particular, The Navigator Company's Code of Ethics and Conduct already expressly prohibits any conduct that could constitute a form of harassment.

However, Law no. 73/2017 of 16 August, amended article 127 of the Labour Code, which now requires employers to adopt codes of conduct to prevent and combat harassment at work, whenever the company has seven or more employees.

Accordingly, in keeping with the provisions of the above-mentioned law, the Board of Directors of The Navigator Company, S.A. approves and implements this Code of Good Conduct as a complementary instrument designed to strengthen the specific rules on preventing and combating this type of conduct in the workplace, which must be observed in Navigator, without prejudice to other rules of conduct applicable to them.

1. Scope of Application

This Code of Conduct applies to all entities comprising The Navigator Company Group.

2. Prohibition of Harassment in the Workplace

- 2.1 Any form of workplace harassment is strictly forbidden, regardless of the specific form it may take.
- 2.2 Harassment is any unwanted behaviour, in particular, based on discrimination, practiced at the time of access to employment or in employment, work or vocational training, with the purpose or effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.
- 2.3 Sexual harassment is unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of harassing or embarrassing a person, affecting his or her dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.
- 2.4 Harassment does not constitute any behaviour or conduct that corresponds to the legitimate exercise by the employer of its legally conferred powers - namely managerial, hierarchical and disciplinary powers.

3. Employee's obligations in respect of harassment

3.1 All Navigator employees are obliged to:

- (a) Observe the rules of conduct in force at Navigator Group companies, ensuring that their conduct does not include or suggest harassment of any kind;
- (b) Report, as soon as possible, any circumstance that constitutes harassment in the workplace.

3.2 Reports shall be made in accordance with The Navigator Company's Whistleblowing Regulations, through any of the channels referred to therein.

3.3 All reports received will be processed in accordance with the mentioned Regulation.

4. Employer's obligations

All Navigator employers shall:

- (a) Together with Navigator Group's employees and collaborators, promote compliance with the provisions of this code of good conduct, with the aim of ensuring the prevention and combating of harassment at work;
- (b) Promote the appropriate dissemination of this Code of Good Conduct, in order to ensure the application and adoption of the principles set out therein;
- (c) Distribute information on the harassment prevention policy in the workplace, when applicable and in accordance with the legislation in force;
- (d) Implement the necessary measures to combat and prevent the practice of harassment in accordance with and under the terms of this Code of Good Conduct.

5. Procedure

5.1 In case of the above-mentioned report is received in writing and is deemed credible and detailed, after a summary verification of its contents, disciplinary proceedings shall be initiated against the employee alleged to have engaged in harassment.

5.2 Navigator undertakes to use its best endeavours to ensure the confidentiality of any procedures relating to cases of harassment at work.

6. Protection of whistleblowers and witnesses in matters of harassment

The complainant of harassment and the witnesses indicated by the complainant may not be disciplined (unless they acted intentionally) based on statements or facts contained in the records of judicial or administrative proceedings initiated by harassment until a final decision has been taken, without prejudice to the exercise of the right to be heard.

7. Consequences of non-compliance

7.1 Violation of this Code of Good Conduct by any employee may be subject to disciplinary action, through the initiation of the respective disciplinary procedure and the application of the appropriate sanction under the legal terms.

7.2 The consequence referred to in the preceding paragraph may also be applied to cases of complaints and/or witnesses of facts reported in the knowledge of their falsity.

7.3 Employees are also warned that certain behaviour that constitute harassment in the workplace may also result in civil or criminal liability, under the general terms.

VERSION	DESCRIPTION	DRAFTING	APPROVAL	DATE OF APPROVAL
1	Initial Issue	CE	CA	25/10/2017
2	Revision	Compliance Area	CA	21/07/2023

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The Board of Directors,