



## **Code of Conduct for Suppliers**

The Navigator Company, S.A. (hereinafter "Navigator") aims to pursue a long-term profitable business in an ethical and responsible manner, taking into account matters such as the global economy, as well as human, social and environmental factors.

Navigator is determined to pursue the principles of corporate social responsibility, legal compliance and continuous improvement, and these are central to its corporate and management culture. These principles have been ingrained within NVG and its corporate culture since its inception, and so these same principles, translated into the following requirements, are equally applicable to all suppliers.

This Code of Conduct complements The Navigator Company's Code of Ethics and Conduct and other policies and procedures referred to herein.

### **Laws and regulations**

Navigator's suppliers must conduct all their operations in accordance with applicable laws and regulations, whenever they pursue their business activities.

This includes, but is not limited to, laws and regulations related to the securities market, corporate governance, competition, product safety and product liability, occupational health and safety, labor issues, the environment, intellectual property protection, individual privacy protection and equality at work.

### **Fair Competition**

Navigator's suppliers must conduct their business in accordance with the rules governing fair competition and all laws on fair and equitable competition.

### **Integrity Verification**

Navigator may, whenever justified, particularly considering the materiality or degree of risk involved, collect information on its suppliers to enable an assessment to be made of their integrity, in accordance with its Compliance Policies.



### **Compliance with International Sanctions and Restrictive Measures**

If any supplier or potential supplier is subject to international sanctions or restrictive measures, Navigator may refuse to enter, or may terminate at any time, the business relationship with the counterparty concerned.

### **Anti-Corruption and Bribery Acts**

Navigator promotes integrity and ethics in all sectors of its activities.

Navigator's suppliers must comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and extortion.

In this regard, suppliers may not offer bribes, gifts or any kind of advantage, whether or not pecuniary, to Navigator employees, managers or directors, with the aim of obtaining or retaining business or gaining an improper advantage for themselves or for third parties.

Nor may Navigator's suppliers request any kind of advantage, whether in cash or otherwise, from Navigator employees, particularly in return for the performance of acts or the adoption of any conduct contrary to the duties of the supplier's position.

Any form of corruption or bribery, whether active or passive, is expressly prohibited.

### **Prevention of Money Laundering and Terrorist Financing**

Navigator has a zero-tolerance policy on money laundering and terrorist financing (MLTF), and so, whenever justified, particularly in view of the materiality or degree of risk involved, and based on the information gathered under the Third Party Integrity Verification Policy, it will assess the MLTF risk associated with its Suppliers, as detailed in the Policy for the Prevention of Money Laundering and Terrorist Financing.

### **Respect for and Promotion of Human Rights**

Navigator respects universal human rights, as defined in the United Nations Universal Declaration of Human Rights, in its operations and promotes their implementation in its sphere of influence. Navigator expects its suppliers to do the same.

Child or forced labor of any kind is prohibited. Unless local laws set a higher age limit, no person under the age for completion of compulsory education or under 15 years of age (except as defined in ILO Convention 138) shall be employed by any Navigator supplier. Employees under the age of 18 must not perform hazardous work and must be prevented from working at night, in view of their educational needs.



The personal dignity, privacy and personal rights of each individual must be respected. All employees of Navigator's suppliers must not be subjected to physical punishment or physical, sexual, psychological or verbal abuse or harassment.

### **Non-Discrimination**

Employees of any supplier, regardless of skin color, race, national origin, social background, possible disability, sexual orientation, political or religious conviction, as well as their gender or age, shall be treated strictly according to their skills and qualifications in any employment decision, including, but not restricted to, recruitment, advancement, compensation, benefits, education, dismissal and termination.

### **Working Hours**

Unless a lower schedule is applicable by virtue of local regulations, or except in extraordinary business circumstances, the supplier's workers shall not, on a regular basis, be required to work for a weekly period exceeding 48 hours or a weekly working period exceeding 60 hours, including overtime. Workers must be entitled to at least one weekly rest day every seven days, except in exceptional business circumstances.

### **Health and Safety**

All Navigator's suppliers shall implement all necessary measures to provide a safe and healthy working environment and prevent accidents and injuries and, when applicable, provide safe and healthy residential facilities, observing the minimum local legal requirements. Navigator encourages suppliers to apply for and maintain an occupational safety management system in accordance with OHSAS 18001 or to implement another similar system.

### **Freedom of Association and Collective Bargaining**

All Navigator suppliers shall implement appropriate measures to respect workers' rights to freedom of association and collective bargaining.

### **Environmental Practices**

All Navigator suppliers shall comply with all environmental regulations and standards applicable to their operations and observe environmentally conscious practices wherever they operate.



Environmental pollution shall be minimized and environmental protection shall be continuously improved. Navigator encourages suppliers to apply for and maintain an environmental management system in accordance with ISO 14001 or to implement another similar system.

### **Confidentiality**

Navigator is committed to handling sensitive information relating to its business partners in a responsible manner. All Navigator suppliers have a duty to take the necessary measures to protect the confidentiality of any information acquired in the course of their business relationship with Navigator and shall not disclose such information to other parties without Navigator's written consent.

### **Privacy**

Where any supplier handles information about the performance of services or products on behalf of Navigator, it shall ensure that such information is treated as confidential, is protected against unauthorized disclosure and is adequately safeguarded.

### **Supplier Responsibility**

As a supplier to Navigator, the supplier's role begins, but does not end, with understanding this Supplier Code of Conduct.

If any conduct, ethical or legal compliance issue is raised, the supplier has a responsibility to raise it through the proper channels, as provided for in The Navigator Company's Whistleblowing Regulations.

### **Questions**

Any doubts or questions regarding the interpretation or application of the Code of Conduct for Suppliers should be addressed to the Compliance Area, via the following email address [compliance@thenavigatorcompany.com](mailto:compliance@thenavigatorcompany.com)

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

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The Board of Directors,