

	<p>NAVIGATOR TERMINALS UK UK POLICY</p> <p><b>Supplier Code of Conduct</b></p>	<p>Doc.no.:NUK-PROCU-POL-0003</p> <p>Issue: 3</p>
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Navigator Terminals Values, Service Principles, Policies and Procedures (hereinafter referred to as our ‘expectations’) underpin our Supplier Code of Conduct, including contractors, vendors, service providers and contingent labour (“suppliers”), their employees and suppliers. This Supplier Code of Conduct does not replace or substitutes applicable laws, nor do they amend prior contracted obligations.

We want our suppliers to strive for positive and pro-active Environmental, Social and Governance (ESG) performance in their supply chain, and innovation and excellence in their delivery. As a Navigator Terminals supplier, we also expect you to commit to, and act in accordance with our expectations. We request that you communicate this Supplier Code of Conduct to your employees, sub-contracted suppliers and business partners who may provide goods or services to Navigator Terminals, and that you:

**Compliance with laws**

1. Comply with all laws and regulations applicable to the goods and services being provided.

**Safety, Health, and Environment (“SHE”)**

2. Conduct business in a way that supports our Navigator Terminals’ expectations by taking a systematic approach to managing operating activities and SHE risks, complying with applicable SHE laws and regulations, and seeking to continuously improve SHE performance. Require your workforce and suppliers to abide by our safety essentials, site rules and permit requirements, stop work that could be unsafe, and report any accident, injury, illness, or unsafe condition immediately, so that appropriate action can be taken.

**Ethical Governance and Compliance**

3. Promote transparency and accountability in the conduct and administration of business, including having in place effective processes and procedures to proactively prevent:
  - a) Bribery and corruption, including expressly prohibiting the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision, including inducing government officials to improperly perform their duties.
  - b) Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
  - c) Actual or apparent conflicts of interest between personal and business interests, including using Navigator Terminals information and resources for improper gains.
  - d) Anti-competitive conduct, including any form of intention, agreement or understanding with competitors to fix prices, rig bids, allocate business or restrict supply.

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e) Provision of gifts, entertainment, or meals to Navigator Terminals personnel or third parties representing Navigator Terminals. When legitimately required in rare cases, they should be of modest value and appropriately timed, however, they are absolutely excluded during competitive bidding processes irrespective of the terminal location.

f) Have a programme in place to promote awareness and embed ethical business practices and compliance with laws in your business.

**United Kingdom (UK) and international trade law**

4. Comply with applicable UK and international trade laws.

a) Classify in advance, with appropriate labelling, documentation, licenses, and approvals completed, all products intended for import or export, including the transfer, or sharing of restricted software, technical data, or technology.

b) The Criminal Finances Act 2017 introduced a new criminal offences to apply to corporations that fail to prevent an ‘associated person’ (someone acting for them or on their behalf), from criminally facilitating tax evasion. This legislation applies to the evasion of both UK and foreign taxes (as long as the foreign tax evasion would also be considered criminal under UK laws).

In the light of Criminal Finances Act 2017, Navigator has adopted a policy on anti- tax evasion. It is our policy to conduct all our business dealings in an honest and ethical manner. The policy governs all our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf. Navigator have a ZERO tolerance approach to all forms of tax evasion, whether under UK law or under the law of a Foreign country.

For the purposes of this Code of Conduct:

Tax evasion means the offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent;

Foreign tax evasion means evading tax in a foreign country, provided that that conduct is an offence in that country and would be a criminal offence if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent; and

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.



Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps within the law, to minimise tax payable (or maximise tax reliefs)

### **Social Performance Expectations**

5. Respect the human rights and dignity of all people and meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including:

- a) Ensuring within your business and supply chain no use of forced or compulsory labour, human trafficking, child labour, slavery or servitude and that all work is conducted voluntarily, without threat of penalty or sanction and not based on deception. These and other expectations are outlined in Navigator Terminals' Labour Rights and Modern Slavery Commitments at the end of this document.
- b) Identifying, avoiding, minimizing, or mitigating and remedying any human rights impacts on communities.
- c) Striving to maximise your corporate contribution to the communities you operate within considering, how you can create and sustain educational, health, welfare, diversity, and inclusion opportunities.

### **Protecting confidential information**

6. Have effective protocols in place for securing and protecting Navigator Terminals information including:

- a) Respecting the proprietary and intellectual property rights of Navigator Terminals.
- b) Having information classification protocols and adopting industry best practices, on sharing, protecting, and securing information.
- c) Observing all data privacy legal requirements on the collection, processing, and transfer of Navigator Terminals personal data
- d) Reporting any suspected or actual information security incidents that impact Navigator Terminals information or systems to Navigator Terminals as soon as practically possible.
- e) Effective provision against cyber threats.

### **Diversity and Inclusion, grievance processes and freedom of association**

7. Provide a workplace which:

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a) Provides opportunities to develop a diverse and inclusive workforce, free from harassment, intimidation, inhumane treatment, and discrimination based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender, or marital status.

b) Has mechanisms to allow workers to speak up or raise grievances without fear of retaliation.

c) Respects individual choices on trade union or works council membership within the appropriate national legal framework.

### **Speak-up**

8. Promote a “speak-up” culture that does not tolerate retaliation. Provide a means for your employees, your suppliers, and your business partners to speak up if they see something that is unsafe, unethical, or potentially harmful involving Navigator Terminals’ businesses or activities. They may inform a member of Navigator Terminals’ management or use Navigator Terminals’ confidential Safecall help line.

## Be Bold Speak up!

### Who is Safecall?

Safecall is a completely independent company that operates a confidential reporting service for many global businesses and it is available 24 hours a day and is staffed by highly skilled professional call handlers. Our offices are based in the UK and you can reach us 24/7 365 days of the year via the Freephone number listed below.

### How does it work?

There are two main ways you can contact Safecall, by Freephone telephone or send a report via Safecall's website, see below for details. When you contact Safecall by telephone you will be asked by the call handler to explain your concern in as much detail as possible. During this time he or she will take notes and may ask you questions based on the account you give. Once complete, Safecall will send a written report to senior management at Navigator Terminals.

### Can I remain anonymous?

Yes. If you do not tell Safecall who you are they will not know your identity. Even if you make a mistake and accidentally tell Safecall your name they will not pass it on. Also, Safecall do not audio record any of the calls to help protect the identity of anonymous callers.

### What can be reported?

The service is available to receive reports including: Health and Safety, Corruption, Bribery, Dishonesty, Fraud, Harassment, Victimization or any other issue that you feel is unacceptable in the workplace.

### Who will receive my report?

The report is initially sent to the Chief Executive Officer who will then allocate the report to the most appropriate person in the business to address.

### How to contact Safecall



0800 915 1571

[www.safecall.co.uk/report](http://www.safecall.co.uk/report)



## Navigator Terminals - Labour Rights Expectations

We are committed to respecting workers' rights, in line with the UN Guiding Principles on Human Rights and the International Labour Organisation (ILO) Core Conventions on Rights at Work and expect our contractors, suppliers and joint ventures we participate in to do the same. Our expectation is that workers in our operations and supply chain tiers are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, or harassment. The below principles are intended to assist us validate our suppliers performance in the provision of their service and help them validate their performance on this expectation through their supply chain.

- 1. Recruitment Fees:** Employers are responsible for all costs and fees associated with recruitment of workers at any point in the recruitment process, regardless of the manner or location of the imposition or collection of the fee. Workers do not pay, are not recharged, or indebted for recruitment, inbound or outbound travel or other fees, irrespective of the method of payment or by whom it was collected. Workers do not suffer unlawful pay deductions to secure a job.
- 2. Protection of Young Persons:** Workers below 15 or the legal minimum working age (whichever is higher) are not hired, either directly or indirectly.
- 3. Terms of employment:** Workers have clear, written employment terms before commencing employment in a language they understand, and in line with role they were promised, and the terms stated at the initial point of recruitment, which are consistently upheld.
- 4. Passports and papers:** Worker passports, travel identification or work authorization papers are not withheld. Workers may choose to lodge their passports or other papers with employers if they genuinely consent to doing so and can freely access them upon request without penalty or delay.
- 5. Legal status:** Workers are legally authorized to work for their employer and possess the necessary visas, work permits, and any similar legal documentary requirements.
- 6. Free movement:** Workers are free to terminate employment upon reasonable notice without penalty. Workers are not prevented from leaving worksites or employment, except for reasonable safety or security reasons.
- 7. Pay:** Workers are paid on time, as per employment terms. Wages, benefits, and overtime rates meet, as a minimum the original promised contract, comparable with similar roles and national legal standards. Wages paid and hours worked are accurately recorded through a time keeping system. Workers do not suffer unlawful pay deductions for continued service or disproportionate monetary penalties as a disciplinary measure.

Workers should be provided with a payslip in a language they understand, detailing pay and all deductions, and remunerated directly into their own bank account.



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- 8. Working time and rest:** Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods. Work undertaken during unsociable hours should be suitably compensated through additional overtime pay.
- 9. Grievance:** A grievance process is in place by which workers can raise issues and concerns anonymously and receive appropriate independent advice, responses, and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination, or harassment.
- 10. Working conditions and accommodation:** Workers enjoy a safe and hygienic working environment. Access to clean toilet facilities, potable water, and if appropriate, sanitary facilities for food storage are provided. Accommodation and food, where provided, is clean, safe and meets the basic needs of the workers.
- 11. Discrimination and harassment:** There shall be no discrimination in employment practices based on race, caste, national origin, religion, age, disability, gender, gender choice, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated.
- 12. Freedom of Association:** In conformance with local law, where workers choose to be represented by trade unions or works councils, employers will cooperate in good faith with the bodies that the employees collectively choose to represent them.
- 13. Controls:** Contractors, suppliers and non-operated joint ventures develop and maintain adequate processes and controls to implement, communicate, monitor, and remediate identified deficiencies regarding the above, including in their supply chains.
- 14. Contracts:** Navigator Terminals Supplier Code of Conduct shall be enshrined in the Contracts placed with its suppliers irrespective of risk and value. Navigator expects that its suppliers shall have pass through clauses in their supplier contracts to faithfully reflect the content and intent of this Supplier Code of Conduct.

**This Supplier Code of Conduct should be signed as part of the supplier approval process, before the Supplier is invited to bid for work and prior to any contract being entered into. Upon signing this Code of Conduct, the Supplier agrees to indemnify Navigator Terminals against legal proceedings, costs and charges derived form any breach of the Code.**

**Authorised Signatory in line with the Supplier's Delegation of Authorities.**

For and on behalf of the Supplier

Signature and date

Name

Position

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