



NAVIGATOR GAS

Modern Slavery Act Statement

This statement is made pursuant to Section 54(1) of the U.K. Modern Slavery Act 2015 (the “**Modern Slavery Act**”), on behalf of Navigator Holdings Ltd. and its subsidiaries (together “**Navigator Gas**”) and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2020.

Our culture

Conducting business ethically is fundamental to the identity and principles of Navigator Gas and underpins our ANCHOR values (Authentic, Nurture, Collaborative, Honest, Ownership, Resourceful). Our ANCHOR values in turn set out our framework for conducting business, ensuring we deliver a safe, reliable and efficient service to our customers.

Navigator Gas is committed to combatting modern slavery and human trafficking.

Our organisation structure and supply chains

Navigator Gas owns and operates the world’s largest fleet of handy-size liquified gas carriers, as well as owning a 50% share in the Morgan’s Point ethylene terminal in Texas, U.S.A. We provide international and regional seaborne transportation services of petrochemical gases, LPG and ammonia, through a reputable supply chain.

Navigator Gas has offices in the United Kingdom, United States of America and Poland, and plays a vital role in the liquefied gas supply chain for energy companies, industrial customers and commodity traders.

Navigator Holdings Ltd. is listed on the New York Stock Exchange (NYSE: NVGS).

Our policies on modern slavery and human trafficking

Modern slavery and human trafficking may take many forms across an organisation, including trafficking of people, forced labour, servitude and slavery. Modern slavery or human trafficking, as referred to in this statement, refers to any offence set out in the Modern Slavery Act.

Navigator Gas is committed to ensuring that there is no modern slavery or human trafficking in any part of our business, including our supply chains. We have a zero-tolerance approach to modern slavery and human trafficking in our commercial dealings and relationships.

We have put into place policies that aim to ensure modern slavery and human trafficking is not taking place within our organisation and supply chains, reflecting our fundamental commitment to conducting business ethically and with integrity. Our policies include:

- **Code of Conduct and Business Ethics Policy:** This policy outlines all expected actions and behaviours of our employees when representing Navigator Holdings Ltd. and its subsidiaries. It outlines our fundamental respect for the rule of law and describes our high business standards;
- **Harassment Procedure Policy:** This policy describes unacceptable workplace behaviour and describes the procedures in place to report unacceptable behaviours;
- **Whistleblowing Policy:** Navigator Gas encourages all its employees and business partners to report all suspected misconduct and illegal acts. Whistleblowing is viewed as a positive act that strengthens our company standards;

- **Sustainable Procurement Policy:** This policy ensures that our Sustainable Procurement Strategy is relayed across our whole supply chain. It outlines our fundamental business principles and sets out required behaviours;
- **Labour and Human Rights Policy:** This policy defines the labour and human rights topics we consider material in our operations and relevant to our business.

Due diligence and our values in the supply chain

Navigator Gas is committed to ensuring that there is no slavery or human trafficking in our supply chain. As part of our initiative to identify and mitigate risk, we have developed a Sustainable Procurement Policy that integrates our sustainability strategy into our supply chain.

The Sustainable Procurement Policy covers a breadth of different corporate responsibility areas that our suppliers are either required or encouraged to abide by. We require that all suppliers do not tolerate child, exploitative, forced, or compulsory labour. We also require adherence to the United Nations Declaration of Human Rights, which protects the rights and freedoms of all human beings.

To ensure compliance with our Sustainable Procurement Policy, we audit suppliers and review supporting evidence.

Business ethics clauses referencing the Modern Slavery Act are to be incorporated into each of our contracts and sub-contracts. We further expect our counterparties to take appropriate steps to prevent modern slavery in their supply chain.

Our training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation, we provide training for our staff and actively encourage our employees to utilise the resources available through the United Nations Global Compact (UNGC) Academy.

Reporting a concern

Navigator Gas personnel are obliged to report business ethics misconduct immediately through our reporting structure. Personnel may also, at their option, report any such violations to our ethics committee or through Navigator Gas' whistleblowing procedure.

Our effectiveness in combatting slavery and human trafficking

As an organisation listed on the New York Stock Exchange, Navigator Holdings Ltd. observes United States corporate governance regulations and practices, including requirements imposed under the Sarbanes-Oxley Act of 2002 and related regulations. Navigator Holdings Ltd. implements all required internal controls to assess and monitor ethics compliance.

Approval

This statement was approved by the board of Navigator Holdings Ltd. on 17th June 2021, and it extends to include Navigator Holdings Ltd.'s subsidiaries, which include NGT Services (UK) Limited, Navigator Gas Shipmanagement Limited, Navigator Gas Invest Limited and Navigator Terminal Invest Limited. A full list of Navigator Holdings Ltd.'s subsidiaries is available in its Group Subsidiaries list in its latest Annual Report on our website: <https://www.navigatorgas.com>.

Date: 21st June 2021
Name: Dr. Harry Deans
Position: Chief Executive Officer

Signed:

A handwritten signature in black ink, appearing to read "Harry Deans". The signature is written in a cursive style with a prominent loop at the top and a horizontal line at the bottom.