



[Navigator Gas Ethics Portal - FAQ](#)

ethics.navigatorgas.com

Navigator is committed to conducting business with honesty and integrity and we expect all of our personnel to maintain high standards, in accordance with our Code of Conduct and Business Ethics.

What is the Navigator Gas Ethics Portal?

The Navigator Gas Ethics Portal is an anonymous reporting tool that enables the reporting of misconduct, including any suspected violation of Navigator Gas' Code of Conduct and Business Ethics. The Portal is provided by third-party Convercent.

The Portal allows reports to be made independently on the internet by using the online form (accessible at ethics.navigatorgas.com) or by telephone with the assistance of a Convercent call centre representative.

The Portal has phone numbers in over 130 locations and supports over 340 languages. You may find an appropriate telephone number at ethics.navigatorgas.com.

What type of issues can be reported using the Navigator Gas Ethics Portal?

The Portal is intended to be used to report suspected violations of Navigator Gas' Code of Conduct and Business Ethics or any related laws or regulations. Such suspected violations may include concerns regarding bribery, facilitation of tax evasion, theft, fraud or other criminal activity, accounting irregularities, theft, human rights, modern slavery, harassment or threats, conflicts of interest, health and safety risks, damage to the environment and any breach of legal or professional obligations.

The Navigator Gas Ethics Portal is not intended to replace the reporting of routine concerns to your manager or to our HR department. Matters such as administrative issues, general employment issues and conflicts or disagreements between staff members should be referred to and resolved by your line manager or Navigator's HR department, in line with our grievance procedures.

What happens once I make a report?

Once your report has been submitted, it will be immediately forwarded to the appropriate person within the Company's legal and compliance team for review.

You will also be provided with a confidential issue access number and asked to provide a personal password and security question. The access number and password allows you to check the status of the report on the Convercent website (www.convercent.com/report), as well as send and receive anonymous messages relating to your report at any time. If you provided an email address, you will also receive email notifications from Convercent as the report status is updated.

The appropriate legal/compliance team member will carry out an initial review to determine whether and to what extent an investigation is required. Depending on the seriousness of the situation, the legal and compliance team member may appoint external advisors to assist with the investigation.

You will be updated about the status of the investigation as far as is appropriate and practical. Any review and findings will be treated in confidence and shall be completed as soon as possible. Any



recommendations will be reported, where appropriate, to Navigator's senior management for follow up and for any remedial action to be implemented.

Will I face retaliation if I make a report?

No.

We encourage openness and will support any reporting individual raising a genuine concern, even if they turn out to be mistaken. Navigator is committed to protecting the rights of any individual making a report and we will not engage in and do not condone any type of reprisal or retaliatory action against any person making a report in good faith.

Navigator does however reserve the right to discontinue any investigation and take appropriate disciplinary action in accordance with applicable law if we conclude that a reporting party has made false allegations maliciously.

If I choose to make a report anonymously, what safeguards are in place to protect my anonymity?

The Navigator Gas Ethics Portal has the option for a reporting person to remain anonymous. If you choose to report on an anonymous basis, Navigator Gas and Convercent will take no action to identify you. All communication between Navigator's legal and compliance team and you will be carried out through Convercent's online messaging system, which is anonymous.

Throughout its investigation, Navigator will take steps to ensure the confidentiality of any report and related investigation. Details of your report will only be disclosed to the extent strictly necessary to carry out any investigation. Navigator will use all reasonable endeavours to ensure that the privacy interests of any implicated person/people are also safeguarded.

In the event you make a report anonymously, you should be aware that proper investigation may be more difficult if we cannot obtain further information from you. It is also more difficult to establish whether any allegations made are credible.

Please note that the details of a report and the person's identity (unless made anonymously) may need to be disclosed to relevant external regulatory authorities if Navigator is required to comply with applicable laws and regulations, or where Navigator has to obtain legal advice.

Can anyone use the Portal?

The Navigator Gas Ethics Portal is intended for use by current and former employees of Navigator, as well as contractors, consultants and interns. However, it may also be used by any of our business partners to report any business-related concern about our organisation.

Do I have to make a report via the Navigator Gas Ethics Portal?

No. The Portal offers two methods of making a report – by telephone and via online form. You may make a report to your line manager, a member of the Executive Committee, the Head of Legal or our HR Manager. You may also make a report to the ethics committee (currently made up of the Head of Legal and our HR Manager) by e-mail at ethics@navigatorgas.com.



What protection is in place for someone implicated in a report?

Navigator is committed to ensuring that the process to review the validity of an allegation made against any person is confidential, fair and impartial. Except where it would be unreasonable or unlawful to do so, we will give any person accused of misconduct the opportunity to respond to any such allegation.

Where required by applicable law, Navigator will inform a person implicated in any report that they are the subject of an investigation. The notification of such information may, however, need to be deferred or limited to safeguard the integrity of the investigation.