Modern Slavery Statement 2026

NAVIGATOR GAS

Introduction

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 December 31, 2025.

Our culture

At Navigator Gas, our culture is built on integrity, respect and doing what is right. These values guide how we work, how we treat one another and how we expect our partners and suppliers to behave. We believe that everyone connected to our operations deserves to be treated fairly, with dignity and without risk of exploitation.

Our People Principles outlines our philosophy around how we collaborate and lead and Navigator Gas. They help us maintain a culture where ethical conduct is embedded in daily decision-making. These expectations apply to all of us and support our commitment to preventing modern slavery in any form.

Modern slavery is fundamentally incompatible with who we are. We are committed to promoting safe, fair and responsible working conditions across our operations and supply chains, and we expect the same high standards from our business partners.

As part of this culture of integrity and respect, Navigator Gas is firmly committed to combating modern slavery and human trafficking, ensuring that exploitation has no place in our operations or supply chain.

Our organisation and supply chains

Navigator Gas is a New York Stock Exchange-listed shipping company (NYSE: NVGS) owning and operating the world's largest fleet of handysize liquefied gas carriers, as well as owning a 50% share, through a joint venture, in an ethylene export marine terminal at Morgan's Point, Texas on the Houston Ship Channel, USA. 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, Denmark, United States of America, Poland, and the Philippines, and plays a vital role in the liquefied gas supply chain for energy companies, industrial customers and commodity traders.

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;
- **Anti-bribery and Corruption Policy**: This policy sets out how Navigator Gas expects its employees to conduct business, to ensure we comply with all applicable anti-corruption laws and conduct business in a socially responsible manner;
- **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; and
- **Recruitment and Onboarding Policy**: This policy describes Navigator Gas' commitment to being an equal-opportunity employer, where prospective employees will receive consideration without discrimination.

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. Navigator Gas conducts risk-based due diligence on third parties with whom we consider entering into a relationship, as well as monitoring clients with whom we have an existing relationship.

Navigator has adopted several third-party tools which assist us in conducting risk-based due

diligence on our counterparties, including their track record for modern slavery and related matters. Our systems consider and provide a risk profile for counterparties based on their behaviour, and include checking adverse media, geographic transparency ratings and presence on sanctions and similar watch lists.

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.

Furthermore, as part of our commitment to mitigating modern slavery risks in our supply chain, we have also conducted a materiality study to identify high-risk areas and assess our exposure. This analysis allowed us to prioritise our due diligence efforts and enhance our supply chain oversight, ensuring adherence to ethical standards.

Strengthening ethical practices through our MACN membership

As a member of the Maritime Anti-Corruption Network ("**MACN**"), Navigator Gas is committed to promoting transparency, ethical business practices, and human rights protections within the maritime industry. Through MACN, we collaborate with industry stakeholders and governments to address corruption risks that can contribute to labour exploitation. Navigator Gas' participation in MACN strengthens our due diligence processes, enhances supplier and agent screening, and supports collective action initiatives aimed at improving governance in ports and shipping operations.

Additionally, we leverage MACN's training resources and anonymous reporting mechanisms to help identify and mitigate unethical labour practices. This includes supporting MACN's efforts to eliminate bribery-linked labour exploitation risks, such as passport retention, coercion of seafarers, and unfair working conditions. By integrating MACN's principles into Navigator's compliance framework, we reinforce our commitment to eradicating modern slavery and ensuring ethical labour standards across our global operations.

Our training

As part of our commitment to preventing modern slavery and human trafficking, we ensure that all new employees receive comprehensive Code of Conduct training during their onboarding process. This training includes guidance on ethical business practices, human rights, and labour standards, helping employees to recognise and prevent risks associated with modern slavery within our operations and supply chains. The Code of Conduct training is also renewed annually to reinforce these principles and ensure ongoing awareness.

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

At the date of this statement, 98% of our shore staff have undertaken mandatory training in

relation to modern slavery. The training provided explains the various forms of modern slavery, including forced labour, human trafficking, bonded labour, and child labour, and provides real-life cases illustrations, as well as the knowledge and tools to recognise and report potential cases of modern slavery.

Reporting a concern

We also encourage openness and accountability. Anyone who observes or suspects behaviour that may amount to modern slavery — within Navigator Gas or in our supply chain — should speak up.

Navigator Gas has a confidential Ethics Portal where employees can report misconduct, anonymously if they wish, via online form or telephone in many different languages, accessible at **navigatorgas.ethicspoint.com**. The Ethics Portal is available 24 hours a day and in over 90 locations. Personnel may also, at their option, report any such violations to Navigator's Ethics Committee, made up of the CEO, Head of People and Culture and General Counsel.

Whistleblowing Hotline Upgrade

Navigator Gas upgraded its whistleblowing hotline to strengthen the accessibility, confidentiality and reliability of our reporting channels. The enhanced system offers improved data privacy protections, a more intuitive reporting interface, and streamlined routing of concerns to the Ethics Committee. These improvements support our commitment to maintaining a safe environment in which employees, seafarers and third-party partners feel confident raising concerns, including potential instances of modern slavery or human rights violations.

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 directors of Navigator Holdings Ltd. on March 10, 2026, and it extends to include Navigator Holdings Ltd.'s subsidiaries, including and especially those incorporated in the United Kingdom. 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:	March 10, 2026	Signed:	
Name:	Mads Peter Zacho		
Position:	Chief Executive Officer		