



SUPPLIER CODE OF CONDUCT

The objective of The Navigator Company, S.A. ("The Navigator Company") is to pursue long term and profitable business in a responsible and ethical manner, taking into consideration matters such as global economy, as well as human, social and environmental factors.

The Navigator Company is determined in the direction of corporate social responsibility, legal compliance and continuous improvement, those being integral constituents of the corporate and management culture. These principles have been rooted in The Navigator Company and in our Group's culture from its beginning and, therefore, the same principles, translated in following requirements, shall also apply to all our suppliers.

This Code of Conduct complements The Navigator Company's Code of Conduct and Ethics and the Company's other policies and standards referenced herein.

Laws and Regulations

The Navigator Company expects its suppliers to comply in all of their operations with applicable laws and regulations wherever they conduct their business. These include, among others, laws and regulations related to securities markets, corporate governance, competition, product safety and product liability, occupational health and safety, labour, environment, protection of intellectual property, protection of individual privacy and equality at work.

Fair Competition

The Navigator Company expects its suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

Anti-Corruption and bribery acts

The Navigator Company promotes integrity and ethics in all aspects of its activities. The Navigator Company employees are expected to promote the interests of The Navigator Company and, in doing so, to act responsibly. The Navigator Company expects the supplier to comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and extortion. Therefore suppliers must not offer bribes, kickbacks or improper gifts or payments of any kind to an employee, manager or director of The Navigator Company or to third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Every form of



corruption or bribery is forbidden, this being valid for active as well as passive bribery.

Respecting and Promoting Human Rights

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

Child or forced labour of any form is forbidden. Unless local law stipulates a higher age limit, no person younger than the age for completing compulsory education or younger than 15 (except as provided for by ILO convention No. 138) shall be employed by any The Navigator Company supplier. Workers under the age of 18 shall not perform hazardous work and should be restricted from night work with consideration given to educational needs.

The personal dignity, privacy and personal rights of every individual have to be respected. All the employees of suppliers of The Navigator Company shall not be subjected to corporal punishment or to physical, sexual, psychological or verbal harassment or abuse.

Non-discrimination

All employees of any supplier, regardless of the colour of their skin, race, nationality, social background, possible disability, sexual orientation, political or religious conviction as well as their gender or age, shall be treated strictly according to their abilities and qualifications in any employment decision, including but not limited to hiring, advancement, compensation, benefits, training, layoffs and termination.

Working hours

Unless local regulations require less maximum working hours, or except under extraordinary business circumstances, employees of the supplier shall not, on a regularly scheduled basis, be required to work a standard work week of more than 48 hours per week or a total work week of more than 60 hours (including overtime). Employees shall be provided at least one day off in every seven day period, except in extraordinary business circumstances



Health and safety

All suppliers of The Navigator Company will undertake all necessary measures to provide a safe and healthy working environment and to prevent accidents and injury and, when applicable, provide safe and healthy residential facilities, with applicable local law as a minimum. The Navigator Company encourages the suppliers to apply for and maintain a job safety management system according to OHSAS 18001 or any equal system has to be in place.

Freedom of Association and Collective bargaining

All The Navigator Company suppliers will undertake appropriate measures to respect the legal right of employees to freedom of association and collective bargaining.

Environmental Practices

All The Navigator Company suppliers will comply with all environmental regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

Environmental pollution shall be minimized and environmental protection shall be improved continuously. The Navigator Company encourages the suppliers to apply for and maintain an environmental management system according to ISO 14001 or any equal system has to be in place.

Confidentiality

The Navigator Company is committed to handling sensitive information concerning our business partners, responsibly. All The Navigator Company suppliers have the duty to take all necessary steps to protect the confidentiality of any information acquired in their business relationship with The Navigator Company, and must not disclose such information to other parties without The Navigator Company's written consent.

Privacy

When any supplier handles information about the performance of services or products on behalf of The Navigator Company, he will ensure that such information is treated as confidential, is protected against unauthorized disclosure and is appropriately safeguarded.



Responsibility of the Supplier

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

If any conduct, ethical or legal compliance issues arise that raise any questions, the supplier has the responsibility to bring them forward.

To raise a concern, the supplier can send an email to comunicacao.irregularidades@thenavigatorcompany.com.

All communications received shall be addressed in accordance with the Rules of Procedure concerning the Communication of Irregularities ("Whistleblowing" Procedure) of The Navigator Company, S.A.

This Supplier Code of Conduct has been approved by the Board of Directors of The Navigator Company, S.A., on October 25th 2017.