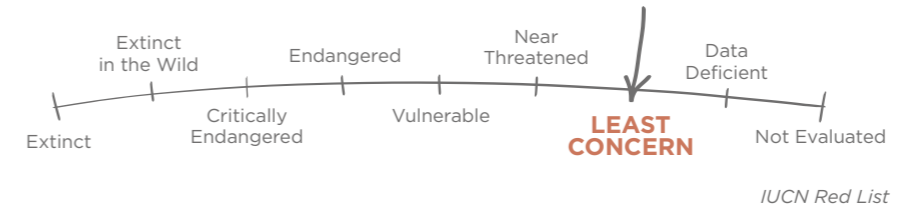


## **Eurasian otter** (*Lutra lutra*)



Well suited to an aquatic environment, the Eurasian otter is an excellent swimmer and diver, spending most of its time in the water, coming on to land only to rest and breed. A carnivore - it hunts mostly fish, but also small mammals, birds and reptiles - it prefers wetlands with food and places of refuge, making its den, or holt, in cavities in rocks. It can be difficult to sight because of its nocturnal habits and the fact that the entry to its den is often under water.



Otters are common throughout Portugal and are found in areas of fresh water (rivers, streams, marshes or lakes), and are less frequent in the brackish waters of estuaries and in salt water. The species

can be found on properties managed by Navigator throughout Portugal, where its habitat benefits from the construction of protection areas around water courses.

## CONTENTS

GRI STANDARD	RESPONSE	LOCATION
<b>ORGANIZATIONAL PROFILE</b>		
<b>GRI 102 -General Disclosures: 2016</b>	<b>102-1 Name of the organisation</b> The Navigator Company S.A.	
	<b>102-2 Primary brands, products and services</b> Chapter 1. Navigator Today. More information at: <a href="http://en.thenavigatorcompany.com/Brands">http://en.thenavigatorcompany.com/Brands</a>	Page 28
	<b>102-3 Location of headquarters</b> Península da Mitrena, Setúbal.	
	<b>102-4 Location of operations</b> Chapter 1. Navigator Today. More information at: <a href="http://en.thenavigatorcompany.com/Institutional/The-Company-around-the-world">http://en.thenavigatorcompany.com/Institutional/The-Company-around-the-world</a>	Page 28
	<b>102-5 Nature of ownership and legal form</b> The Navigator Company, SA is a public limited company, with registered offices at Península da Mitrena, Freguesia do Sado, in Setúbal, registered with the Setúbal Companies Registry. The Navigator Company, S.A. is listed on the Lisbon Stock Exchange (Euronext Lisboa), and included in its market index, the PSI 20.	
	<b>102-6 Markets served</b> Chapter 1. Navigator Today. More information at: <a href="http://en.thenavigatorcompany.com/Pulp-and-Paper/Paper/Our-Paper-in-the-World">http://en.thenavigatorcompany.com/Pulp-and-Paper/Paper/Our-Paper-in-the-World</a>	Pages 28-29
	<b>102-7 Scale of the organisation</b> Chapter 1. Navigator Today.	Pages 28-31
	<b>102-8 Information on Employees and other workers</b>	

Total number of employees by type of employment contract, by gender.

		2017	2018	2019
<b>Permanent contract</b>	Men	2,412	2,458	2,524
	Women	391	404	449
	<b>Subtotal</b>	<b>2,803</b>	<b>2,862</b>	<b>2,973</b>
<b>Fixed-term contract</b>	Men	87	155	66
	Women	20	59	25
	<b>Subtotal</b>	<b>107</b>	<b>214</b>	<b>91</b>
<b>Temporary</b>	Men	40	39	43
	Women	7	11	16
	<b>Subtotal</b>	<b>47</b>	<b>50</b>	<b>59</b>
<b>Trainees</b>	Men	0	0	0
	Women	0	0	0
	<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>		<b>2,957</b>	<b>3,126</b>	<b>3,123</b>

GRI STANDARD	RESPONSE	LOCATION
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Total number of employees by type of employment contract, by region.

		2017	2018	2019
<b>Permanent contract</b>	Aveiro	294	319	442
	Figueira da Foz	970	986	990
	Vila Velha de Ródão	202	201	223
	Setúbal	1,050	1,058	1,093
	Other	195	212	142
	<b>Subtotal (PT)</b>	<b>2,711</b>	<b>2,776</b>	<b>2,890</b>
	Abroad	92	86	83
	<b>Total</b>	<b>2,803</b>	<b>2,862</b>	<b>2,973</b>
<b>Fixed-term contract</b>	Aveiro	28	135	50
	Figueira da Foz	23	24	18
	Vila Velha de Ródão	4	2	3
	Setúbal	49	48	16
	Other	0	3	4
	<b>Subtotal (PT)</b>	<b>104</b>	<b>212</b>	<b>91</b>
	Abroad	3	2	0
	<b>Total</b>	<b>107</b>	<b>214</b>	<b>91</b>
<b>Temporary</b>	Aveiro	5	6	11
	Figueira da Foz	3	1	0
	Vila Velha de Ródão	0	1	0
	Setúbal	37	41	48
	Other	1	1	0
	<b>Subtotal (PT)</b>	<b>46</b>	<b>50</b>	<b>59</b>
	Abroad	1	0	0
	<b>Total</b>	<b>47</b>	<b>50</b>	<b>59</b>
<b>Trainees</b>	Aveiro	0	0	0
	Figueira da Foz	0	0	0
	Vila Velha de Ródão	0	0	0
	Setúbal	0	0	0
	Other	0	0	0
	<b>Subtotal (PT)</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Abroad	0	0	0
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>		<b>2,957</b>	<b>3,126</b>	<b>3,123</b>

Total number of employees by employment type, by gender.

		2017	2018	2019
<b>Full-time</b>	Men	2,539	2,651	2,632
	Women	412	469	485
	<b>Subtotal</b>	<b>2,951</b>	<b>3,120</b>	<b>3,117</b>
<b>Part-time</b>	Men	0	1	1
	Women	6	5	5
	<b>Subtotal</b>	<b>6</b>	<b>6</b>	<b>6</b>
<b>TOTAL</b>		<b>2,957</b>	<b>3,126</b>	<b>3,123</b>

GRI STANDARD	RESPONSE	LOCATION
<b>102-9 Supply chain</b>	The Navigator Company purchases different types of products and services, notably the following: wood, chemicals, packaging materials, consumables for paper machines, and general and industrial services.	Pages 111-115
<b>102-10 Significant changes in the organisation or its supply chain</b>	No significant changes to report.	
<b>102-11 Addressing the precautionary approach or principle</b>	Corporate Governance Report 2019: C. Internal Organisation, III. Internal control and risk management.	Pages 147-154
<b>102-12 External initiatives</b>	In 2019, The Navigator Company took part in a variety of significant initiatives in the field of sustainability: it adopted the "CEO Guide to Human Rights", published by WBCSD (World Business Council for Sustainable Development), on the importance of Human Rights today in business management, signed by the chairmen and CEOs of a large group of companies, including Navigator; participation in the "Forest Sector SDG Roadmap" developed by the WBCSD Forest Solutions Group (FSG), in which Navigator is co-chair, as well as signatory of the preface; participation in the WBCSD's "Vision 2050 Refresh" initiative. Representation and active participation in task forces for the Circular Economy, Carbon Neutrality and Natural Capital in WBCSD and in BCSD Portugal.	

**102-13 Membership of associations**

Entity	Type of membership
AEM - Association of Portuguese Issuers of Listed Securities	Member of the Management Board
APA - Portuguese Environment Agency	Associate Member
APE - Portuguese Energy Association	Member of the Management Board
APIGCEE - Association of Major Industrial Power Consumers	Secretary of the General Meeting
AISET - Setúbal Peninsula Industrial Association	Chair of the General Meeting
APLOG - Portuguese Logistics Association	Member of the Management Board
APQ - Portuguese Quality Association	Associate Member
APREN - Portuguese Renewable Energy Association	Member of the Management Board
APPLSSA - Local Protected Landscape Association, Serras do Socorro e Archeira	Member of the Advisory Board
Minho-Lima Association for Forestry Certification	Member of the Management Board
ASWP - Smart Waste Portugal	Associate Member
BCSD Portugal - Business Council for Sustainable Development	Chair of the Management Board
Biobased Industries Consortium	Associate Member
CBE - Biomass for Energy Centre	Chair of the General Meeting
CELPA - Portuguese Paper Industry Association	Chair of Management Board   Chair of Executive Board   Chair of General Meeting   Member of Management Board
Centro Habitat - Platform for Sustainable Construction	Associate Member
CEPI - Confederation of European Paper Industries	Member of Energy and Environment Committees
CIP - Confederation of Portuguese Industry	Vice-chair of National Environmental Strategy Committee   Member of National Energy Strategy Committee
CPA - Aveiro Port Community	Member of Management Board

CPC - Portuguese Shippers' Council	Vice-Chair
CPFF - Figueira da Foz Port Community	Chairman
CPS - Setúbal Port Community	Member of the Audit Board
COGEN Portugal - Portuguese Association for Energy Efficiency and Promotion of Cogeneration	Member of the Management Board
COTEC Portugal - Business Association for Innovation	Member of the General Council
EUROGRAPH - European Association of Graphic Paper Producers	Board Member   Chair of the Environmental Working Group
FORESTIS - Portuguese Forestry Association	Member of the Higher Council
TFD - The Forest Dialogue	Member of the Steering Committee
FpC - Forum for Competitiveness	Member of the Management Board
FSC International	Associate Member
FSC Portugal - Forest Stewardship Council	Associate Member   Alternate Member of the Audit Board
IPQ - Portuguese Quality Institute	Associate Member
IUFRO - International Union of Forestry Research Organizations	General Director - RAIZ   Associate Member
Paper Profile - Environmental Product Declaration for Paper	Associate Member
PEFC Portugal - Council for the Portuguese Forestry Sector	Vice-Chair of the Management Board
Print Power Portugal	Member of Marketing Group
TECNICELPA - Portuguese Association of Cellulose and Paper Industry Technicians	Chair of Management Board   Secretary of General Meeting   Secretary of Audit Board
WBCSD - World Business Council for Sustainable Development	Member of Executive Committee   Co-chair of Forest Solutions Group
WWF International - New Generation Plantations platform (NGP)	Founding member of platform

GRI STANDARD	RESPONSE	LOCATION
<b>GRI 102- General Disclosures: 2016</b>	<b>102-14 Statement from senior decision maker</b> Message from the Board of Directors.	Pages 8-9
	<b>102-15 Key impacts, risks, and opportunities</b> Chapter 2. A Business with a Purpose 2.2 Sustainability Governance. Annual Report 2019, 9. Corporate Governance Report: C. Internal Organisation, III. Internal control and risk management.	Pages 39-40 Pages 140-146

**ETHICS AND INTEGRITY**

**GRI 102- General Disclosures: 2016**      **102-16 Values, principles, standards, and norms of behaviour**  
 Values are mentioned in chapter 2. A Business with a Purpose. The Principles are established in the documents described below and include, among others: compliance with the law, transparency, integrity, confidentiality, courtesy, non-discrimination and non-coercion, training. Navigator's Standards and Rules of Conduct are described in the following documents:  
 - Code of Ethics and Good Conduct;  
 - Code of Conduct for Suppliers;  
 - Code of Good Conduct for Preventing and Combating Workplace Harassment;  
 - Whistleblowing Regulations;  
 - Memorandum on prohibition of market abuse;  
 - Memorandum on managers' operations, in connection with the prohibition of market abuse.

Navigator is developing a training programme on the Code of Ethics and Good Conduct and the related internal regulations. This training will be offered from 2020 to all employees, on an online e-learning basis, in order to underline the importance of the rules contained in the internal codes of ethics and good conduct.

**102-17 Mechanisms for advice and concerns about ethics**  
 Navigator approved a new Compliance Programme, consisting of different steps to be implemented over several phases. In this context, the Code of Ethics and Conduct and the Whistleblowing Regulations were reviewed, and the Code of Conduct for Suppliers and the Code of Good Conduct for prevention of workplace harassment were also approved. The Code of Conduct for Suppliers was distributed to around 90% of materially relevant suppliers.

**Number of whistleblowing reports received, type and percentage addressed, resolved or ruled groundless during the reporting period**

	2018	2019
<b>No. Reports</b>	7	4
<b>Type</b>	<ul style="list-style-type: none"> <li>&gt; Situation of bullying</li> <li>&gt; Tree felling intention / forestry operations by third parties</li> <li>&gt; Irregularities in competitions and promotions organised by Company brands</li> <li>&gt; Irregular sized paper</li> <li>&gt; Other topics still under investigation</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Inappropriate behaviour between co-workers</li> <li>&gt; Improper conduct by employee of a service provider</li> <li>&gt; Discrimination and working conditions at one of the Group's plants</li> <li>&gt; Safety issues in container loading</li> </ul>
<b>Processing (addressed/resolved)</b>	7 reports received in 2018 and 3 carried over from 2017; 6 irregularities closed and 4 still under investigation.	4 reports received in 2019 and 4 carried over from 2018; 5 irregularities closed and 3 yet to be closed (2 under investigation and one awaiting closure).

The feedback obtained has pointed to complete satisfaction with the existing procedures.

**GOVERNANCE**

**GRI 102- General Disclosures: 2016**      **102-18 Governance structure**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-19 Delegating authority**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-20 Executive-level responsibility for economic, environmental, and social topics**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-21 Consulting stakeholders on economic, environmental and social topics**  
 Chapter 2. A Business with a Purpose, 2.4. Materiality Assessment.      Pages 42-43

**102-22 Composition of the highest governance body and its committees**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-23 Chair of the highest governance body**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-24 Nominating and selecting the highest governance body**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-25 Conflicts of interest**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-26 Role of highest governance body in setting purpose, values, and strategy**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-27 Collective knowledge of highest governance body**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-28 Evaluating the highest governance body's performance**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-29 Identifying and managing economic, environmental, and social impacts**  
 Annual Report 2019, 9. Corporate Governance Report: B. Statutory Bodies and Committees, II. Management and Supervision.      Pages 104-129

**102-30 Effectiveness of risk management processes**  
 Annual Report 2019, 9. Corporate Governance Report: C. Internal Organisation, III. Internal Control and Risk Management.      Pages 140-146

**102-31 Review of economic, environmental, and social topics**  
 Chapter 2. A Business with a Purpose, 2.4 Materiality Assessment.      Pages 42-43

**102-32 Highest governance body's role in sustainability reporting**  
 Chapter 2. A Business with a Purpose, 2.2 Sustainability Governance.      Page 38

**102-33 Communicating critical concerns**  
 Annual Report 2019, 9. Corporate Governance Report C. Internal Organisation, II. Reporting of Irregularities (Whistleblowing). Navigator also has a channel for direct access to the Ethics Committee which can be used by any stakeholders.      Pages 139-140

**102-34 Nature and total number of critical concerns**  
 Nothing to report.

**102-35 Remuneration policies**  
 Annual Report 2019, 9. Corporate Governance Report: D. Remuneration.      Pages 148-153

**102-36 Process for determining remuneration**  
 Annual Report 2019, 9. Corporate Governance Report: D. Remuneration.      Pages 148-153

**102-37 Stakeholders' involvement in remuneration**  
 Annual Report 2019, 9. Corporate Governance Report : D. Remuneration.      Pages 148-153

GRI STANDARD	RESPONSE	LOCATION
	<b>102-38 Annual total compensation ratio</b> Annual Report 2019, 9. Corporate Governance Report: D. Remuneration.	Pages 148-153
	<b>102-39 Percentage increase in annual total compensation ratio</b> Annual Report 2019, 9. Corporate Governance Report: D. Remuneration.	Pages 148-153

## STAKEHOLDER ENGAGEMENT

### GRI 102- General Disclosures: 2016

#### 102-40 List of stakeholder groups

The main stakeholder groups include:

- Shareholders
- Business Associations
- Customers
- Employees
- Community
- Government and Regulatory Entities
- Suppliers
- NGOs
- Forest Landowners and Forestry Associations
- Science and Technology System

#### 102-41 Collective bargaining agreements

	2017	2018	2019
<b>Number of employees</b>	2,957	3,126	3,123
<b>Number of employees covered by collective bargaining agreements</b>	852	817	789
<b>Percentage of employees covered by collective bargaining agreements</b>	29%	26%	25%

#### 102-42 Identifying and selecting stakeholders

The stakeholders were identified at an internal workshop with members of the Executive Committee, as part of the last engagement exercise conducted in 2015. There was no change over the year in the categories identified.

#### 102-43 Approach to stakeholder engagement

The Navigator Company encourages regular and systematic dialogue with a wide range of stakeholders. It does this through institutional communication media, such as the website and Intranet, and by pursuing dialogue initiatives with representatives of different stakeholder groups, such as the sessions of the Navigator Sustainability Forum.

#### Customers:

Satisfaction surveys were conducted in 2019 of both UWF paper customers and paper tissue customers.

	2017	2018	2019
	93% (UWF)	60% (Tissue)	91% (UWF)
	68% (Pulp)		64% (Tissue)
	65% (Tissue)		

#### Employees:

The Navigator Company's corporate volunteering programme was stepped up with opportunities to help clear invasive species from woodlands areas of public interest in areas close to the Company's industrial sites and forest holdings. With a satisfaction rating of 98%, Employees clearly see this programme as a way of enhancing Navigator's corporate citizenship.

GRI STANDARD	RESPONSE	LOCATION
	<b>Suppliers:</b> A sustainability questionnaire was sent out to the main categories of suppliers (wood, chemicals, logistics, and other products and services), surveying materially relevant suppliers who account for at least 80% of the Company's annual turnover. The response rate was 96%, making it possible to assess the sustainability performance of approximately 76% of Navigator's total purchasing.	
	<b>Other engagements:</b> Other stakeholder engagement initiatives include: Sustainability Forum (annual), Suppliers' Day (biannual), visits to mills, customer events (over the year), meetings with forestry producers (over the year), meetings with the Environmental Board and with the Environmental Monitoring Committees (four local committees, one for each region where our industrial facilities are located: Aveiro, Figueira da Foz, Vila Velha de Ródão and Setúbal).	
	<b>102-44 Key topics and concerns raised</b> Chapter 2. A Business with a Purpose, 2.4 Materiality Assessment.	Pages 43-44

## REPORTING PRACTICE

### GRI 102- General Disclosures: 2016

#### 102-45 Entities included in the consolidated financial statements

About this Report.

Page 13

#### 102-46 Defining report content and topic Boundaries

About this Report.

Chapter 2. A Business with a Purpose, 2.3 Impacts on value chain.

Page 13

Page 41

#### 102-47 List of material topics

Chapter 2. A Business with a Purpose, 2.4 Materiality Assessment.

Page 43

#### 102-48 Restatements of information

No restatements to report.

#### 102-49 Changes in reporting

The information in this report is organised around the 9 material topics and responds to the Sustainability Roadmap presented in the previous Sustainability Report.

#### 102-50 Reporting period

1 January to 31 December 2019.

#### 102-51 Date of most recent report

The last report referred to 2018 and was published in May 2019.

#### 102-52 Reporting cycle

Annual.

#### 102-53 Contact point for questions regarding the report

About this Report.

Page 13

#### 102-54 Claims of reporting in accordance with the GRI Standards

About this Report.

Page 13

#### 102-55 GRI content index

This table.

#### 102-56 External assurance

About this Report.

Independent Limited Assurance Report.

Page 13

Pages 136-138



## SPECIFIC CONTENTS

GRI STANDARD	RESPONSE	LOCATION
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### SUSTAINABLE FOREST MANAGEMENT

GRI 103 - Management Approach: 2016	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Forest Management", chapter 4.1.	Page 81
	<b>103-2 The management approach and its components</b> Chapter 4.1 Sustainable Forest Management.	Pages 81-85
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

### INNOVATION

GRI 103 - Management Approach: 2016	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Innovation", chapter 4.9.	Page 131
	<b>103-2 The management approach and its components</b> Chapter 4.9 Innovation, Research and Development.	Pages 131-133
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

### ECONOMIC PERFORMANCE

#### ECONOMIC PERFORMANCE

GRI 103 - Management Approach: 2016	<b>103-1 Explanation of the material topic and its Boundary</b> Although this is not a material topic, The Navigator Company regularly monitors and assesses indicators associated with this topic.
GRI 201 - Economic Performance: 2016	<b>201-1 Direct economic value generated and distributed</b> Although this is not a material topic, The Navigator Company regularly monitors and assesses indicators associated with this topic.

('000 euros)	2017	2018	2019
<b>Direct Economic Value Generated</b>	<b>1,670,423</b>	<b>1,728,755</b>	<b>1,726,946</b>
Revenues	1,670,423	1,728,755	1,726,946
<b>Direct Economic Value Distributed</b>	<b>1,538,888</b>	<b>1,511,018</b>	<b>1,579,463</b>
Operating costs	1,074,084	1,056,204	1,181,062
Employee pay and benefits	156,045	161,631	145,658
Payments to capital providers	257,704	222,490	218,910
Payments to the State	49,090	68,267	32,052
Investments in the community	1,964	2,426	1,781
<b>Accrued Economic Value</b>	<b>131,535</b>	<b>217,737</b>	<b>147,483</b>

The reduction in investment in the community in 2019 was due above all to the decrease in subsidised sales of improved plants (Viveiros Aliança).

As regards shareholder remuneration, on 24 April 2019, The Navigator Company distributed dividends of € 200 million, representing a gross dividend of 0.27943 €/share. In addition, on several occasions during the year the company acquired 5,452 million of its own shares, clearing signalling confidence in the shares and representing an investment of approximately € 18 million.

GRI STANDARD	RESPONSE	LOCATION
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**201-2 Financial implications and other risks and opportunities due to climate change:**  
The financial implications for the organisation's activities resulting from climate change consist of costs incurred on CO<sub>2</sub> licenses under ETS (European Emissions Trading Scheme).

	2018	2019
<b>Number of CO<sub>2</sub> emission licenses</b>	442,145	267,222
<b>Market value (€)</b>	10,496,522	6,552,283

**201-3 Defined benefit plan obligations and other retirement plans**  
Report and Accounts 2019: Consolidated Accounts and Notes to the Financial Statements - 7.2 Employee Benefits. Pages 256-261

#### 201-4 Financial assistance received from government

	2017	2018	2019
<b>Tax Incentives/Credits</b>	0	7,953,725	3,129,675
<b>Subsidies</b>	68,664	287,082	220,473
<b>Support for research, development and others</b>	368,284	1,341,754	2,434,430
<b>Total</b>	436,948	9,582,561	5,784,578

### INDIRECT ECONOMIC IMPACTS

GRI 103 - Management Approach: 2016	<b>103-1 Explanation of the material topic and its Boundary</b> Although this is not a material topic, The Navigator Company regularly monitors and assesses indicators associated with this topic.
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GRI 203 - Indirect Economic Impact: 2016	<b>203-1 Infrastructure investments and services supported</b>																
	<table border="1"> <thead> <tr> <th></th> <th>2017</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td><b>Community Investment (M €)</b></td> <td>1.96</td> <td>2.43</td> <td>1.78</td> </tr> <tr> <td><b>Paper donations (€)</b></td> <td>12,538</td> <td>31,157</td> <td>25,711</td> </tr> <tr> <td><b>Paper donations (t)</b></td> <td>14</td> <td>34</td> <td>37</td> </tr> </tbody> </table>		2017	2018	2019	<b>Community Investment (M €)</b>	1.96	2.43	1.78	<b>Paper donations (€)</b>	12,538	31,157	25,711	<b>Paper donations (t)</b>	14	34	37
	2017	2018	2019														
<b>Community Investment (M €)</b>	1.96	2.43	1.78														
<b>Paper donations (€)</b>	12,538	31,157	25,711														
<b>Paper donations (t)</b>	14	34	37														

#### 203-2 Significant indirect economic impacts

The Navigator Company's indirect economic impacts were the subject of an independent study conducted by the consultant KPMG. The research findings - National and Regional Economic Impact of The Navigator Company's Industrial Units - were presented at the Sustainability Forum session in April 2016.

By way of example, the report points to 15,931 jobs indirectly created and a contribution of € 631 million to Portuguese GDP.

For data on the impact of each industrial unit, please contact The Navigator Company. KPMG conducted further research in 2018 into the impact of the tissue project at the Aveiro Complex on the socio-economic development of the region in 2020, and the findings were presented at the Sustainability Forum held in October 2018. The conclusions point to creation of direct, indirect and induced employment for 760 individuals and an impact of € 51 million on GDP, as well as increased orders to local suppliers.

### PROCUREMENT PRACTICES

GRI 103 - Management Approach: 2016	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6. Page 111
	<b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management. Pages 111-115

GRI STANDARD	RESPONSE	LOCATION
	<p><b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.</p>	

GRI 204 - Procurement Practices: 2016	204-1 Proportion of spending on local suppliers		
	2017	2018	2019
Total no. of suppliers	7,658	7,561	7,454
% local suppliers	72%	75%	76%
% foreign suppliers	28%	25%	24%
Total expenditure on suppliers (€)	1,382,991,724	1,620,238,914	1,521,225,054
% expenditure on local suppliers	72%	74%	74%
% expenditure on foreign suppliers	28%	26%	26%

## ANTI-CORRUPTION

<b>GRI 103 - Management Approach: 2016</b>	<p><b>103-1 Explanation of the material topic and its Boundary</b> The Navigator Company assigns fundamental importance to questions of ethics and corporate governance, which include anti-corruption issues. The potential importance of this dimension is reflected above all in procurement procedures.</p>
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### 103-2 The management approach and its components

The organisation seeks in every way to implement control procedures that mitigate the risk of corruption and subjects those procedures to constant monitoring. To this end, the Code of Ethics and Conduct and the Whistleblowing Regulations have been recently reviewed, and the Code of Conduct for Suppliers and the Code of Good Conduct for prevention of workplace harassment have also been approved. These rulebooks complement other internal codes, policies and procedures which together govern The Navigator Company's ethical principles, as part of wider efforts to develop its Compliance Programme.

### 103-3 Evaluation of the management approach

The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.

<b>GRI 205 - Anti-corruption: 2016</b>	<p><b>205-1 Operations assessed for risks related to corruption</b> No corruption risk assessments were conducted during the reporting period.</p>
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### 205-2 Communication and training about anti-corruption policies and procedures

Navigator is developing a training programme on the Code of Ethics and Good Conduct and the related internal regulations. This training will be offered from 2020 to all Employees, on an online e-learning basis, in order to underline the importance of the rules contained in the internal codes of ethics and good conduct.

### 205-3 Confirmed incidents of corruption and actions taken

There were no confirmed incidents of corruption during the reporting period.

## ANTI-COMPETITIVE BEHAVIOUR

<b>GRI 103 - Management Approach: 2016</b>	<p><b>103-1 Explanation of the material topic and its Boundary</b> The Navigator Company assigns fundamental importance to questions of ethics and corporate governance, which include unfair competition issues. The potential importance of these issues is reflected above all in prices that the Company may set, with an impact on sales - both in Portugal and abroad.</p>
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### 103-2 The management approach and its components

The Navigator Company seeks to ensure that its business strategy is in line with legal and market requirements. The Company has defined its Policy on anti-competitive behaviour in Article 14 of the Code of Ethics and Good Conduct, where it undertakes to act in conformity with competition laws and in keeping with market rules and standards, and also to promote fair competition. This duty is also established in the Code of Conduct for Suppliers. These codes also establish commitments, objectives and targets.

GRI STANDARD	RESPONSE	LOCATION
	<p>Management responsibility for this topic lies with the Directors with special responsibilities for pricing, sales (Europe and other international markets) and competition, and for management control and planning, the sector that controls the costs associated with any corrective measure and impact on prices. The main divisions involved are the pricing, sales, management control, legal and risk management divisions. Internally, this is supported by the whistleblowing regulations and externally reports can be submitted to the competition authority using the procedures established in law.</p>	

### 103-3 Evaluation of the management approach

This evaluation is made through the Company's various internal control procedures, duly explained in the Annual Report and Accounts. In the particular case of the anti-dumping proceedings pending, the situation is monitored by the Risk Management Division with essential support from external audits/consultancy provided by the law firm CLK. CLK draws up a monthly report on The Navigator Company's operations in the USA. CLK reports have been positive and offer monthly suggestions on how to minimise the risk of incurring anti-dumping duties. The Navigator Company considers that it has made no contribution to impacts relating to anti-competitive practices and that no changes were required to the management approach during the reporting period.

<b>GRI 206 - Anti-competitive Behaviour: 2016</b>	<p><b>206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices</b> Administrative proceedings were brought at the US Department of Commerce, in relation to international trade law, concerning exports of paper from Portugal to the United States, although Navigator has not acted in breach of competition law. Anti-dumping duties have been applied to Portugal's exports to the United States of certain types of paper marketed by Navigator. In the last period for which this duty was set definitively (2017-2018), it was set at 4.37%, and this is the rate being used for the deposits that the Company has to make on each export operation. These deposits are subject to subsequent adjustment, in line with new decisions issued and confirmed by the Department of Commerce.</p>
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## ENVIRONMENTAL PERFORMANCE

### MATERIALS

<b>GRI 103 - Management Approach: 2016</b>	<p><b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Industrial Environmental Management", chapters 3.1.2 and 4.3.</p>	Page 54 Page 93
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### 103-2 The management approach and its components

Chapter 3.1.2 Protection of Natural Resources.  
Chapter 4.3 Industrial Environmental Management.

Page 54  
Pages 93-96

### 103-3 Evaluation of the management approach

The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.

<b>GRI 301 - Materials: 2016</b>	<p><b>301-1 Materials used by weight or volume</b></p>
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	2017	2018	2019	
Renewable materials (t)	Total	4,821,340	4,622,159	4,601,789
	% Total	90%	90%	90%
Non-renewable materials (t)	Total	539,709	518,055	499,272
	% Total	10%	10%	10%
<b>Total of materials</b>		5,361,049	5,140,214	5,101,062

### 301-2 Recycled input materials used

0.05% in 2019.

### 301-3 Reclaimed products and their packaging materials

Quantitative information not available. The Navigator Company complies with Directive (EU) 453/2010, of 20 May, publishing a technical safety sheet for each product detailing its main features, applications and recommendations for use and recycling.

GRI STANDARD	RESPONSE	LOCATION
	With regard to recycling and potential reductions in consumption of packaging materials, the Group also complies with European Standards EN 13427, EN 13428, EN 13429 and EN 13430 drafted to respond to Community Directive 1994/62/EC which regulates packaging and packaging waste. In this field, The Navigator Company works with Sociedade Ponto Verde for all its own brands sold on the domestic market, paying this entity a fee as the national operator responsible for managing packaging waste.	

## ENERGY

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Energy and Climate", chapters 3.1.2 and 4.2.	Pages 54, 62 and 87
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	<b>103-2 The management approach and its components</b> Chapter 3.1.2 Protection of Natural Resources. Chapter 4.2 Energy and Climate.	Pages 54 and 68 Pages 87-91
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	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	
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<b>GRI 302 - Energy: 2016</b>	<b>302-1 Energy consumption within the organization</b>	
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	2017	2018	2019
<b>Total energy consumption per non-renewable source (GJ)</b>	11,742,326	12,418,288	12,922,614
<b>Total energy consumption per renewable source (GJ)</b>	26,515,741	26,265,821	25,805,941
<b>Total energy acquired for consumption (GJ)</b>	4,901,205	4,785,894	4,728,958
<b>Total energy sales (GJ)</b>	5,764,804	5,663,269	5,233,438
<b>Total energy consumption within the organization (GJ)</b>	37,394,468	37,806,734	38,224,076

Operations consisting solely of power generation are not included within the scope of the Sustainability Report, and so the Biomass Power Plants are not considered; as a result, consumption of external biomass is classified as nil. Consumption of acquired thermal energy relates to consumption of natural gas and fuel oil, including consumption by the kilns (thermal energy for steam generation and process). The figures presented for 2017 do not include the unit in Vila Velha de Ródão. The figures for 2019 include the unit in Vila Velha de Ródão as well as the Tissue unit in Aveiro.

	<b>302-2 Energy consumption outside of the organization</b>	
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	2017	2018	2019
<b>Wood transport (GJ)</b>	956,367	980,841	1,065,134
<b>Paper transport (GJ)</b>	1,222,743	1,355,338	1,160,918
<b>Total (GJ)</b>	2,179,110	2,336,179	2,226,052

	<b>302-3 Energy intensity</b>	
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	2017	2018	2019
<b>Energy intensity (GJ/t)</b>	11.8	12.3	12.6

The calculation of energy intensity took into account energy consumption per non-renewable and renewable resource and the total quantity of products manufactured. The figures presented for 2017 do not include the unit in Vila Velha de Ródão.

	<b>302-4 Reduction of energy consumption</b>	
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	2017	2018	2019	
<b>Reduction of energy consumption</b>	KWh	1,068,225	20,951,920	13,322,586
	GJ	3,846	75,246	47,961

GRI STANDARD	RESPONSE	LOCATION
	The figures reported include reduction in consumption of power and primary energy. The variation is related to the type of projects implemented. The efficiency projects implemented may vary in scope and number from year to year.	

	<b>302-5 Reductions in energy requirements of products and services</b> Not Applicable.	
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## WATER

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Industrial Environmental Management", chapters 3.1.2 and 4.3.	Pages 60 and 93
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	<b>103-2 The management approach and its components</b> Chapter 3.1.2 Protection of Natural Resources. Chapter 4.3 Industrial Environmental Management.	Pages 60-61 Pages 93-96
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	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	
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<b>GRI 303 - Water: 2018</b>	<b>303-1 Interactions with water as a shared resource</b> Chapter 4.3 Industrial Environmental Management.	Pages 93-94
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	<b>303-2 Management of water discharge-related impacts</b> The Navigator Company complies with all legislation in force governing this matter and all the Company's effluents undergo primary and secondary treatment prior to discharge in the receiving environment. The response is complemented by Indicator 303-4 Effluents.	
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	<b>303-3 Water Withdrawal</b>	
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	2017	2018	2019
<b>Surface water (1000 m³)</b>	41,767	41,528	42,716
<b>Groundwater (1000 m³)</b>	26,699	24,967	25,760
<b>Third-party water (1000 m³)</b>	58	65	65
<b>Total water withdrawn (1000 m³)</b>	68,525	66,560	68,541
<b>Surface water (%)</b>	61.0%	62.4%	62.3%
<b>Groundwater (%)</b>	39.0%	37.5%	37.6%

There is no indication that the Drainage Basins (DB) from which Navigator withdraws water are under water stress. The Mondego, Vouga and Lis DB is not subject to excessive pressure of use, and is used in accordance with the Central Region Hydrographic Region (HR4) Management Plan. In the Sado and Mira watershed, groundwater is regularly monitored, in terms of quality and quantity, and there is no indication of water stress. Although groundwater is not subject to stress, the Company takes care to manage it as well as possible. All the water withdrawn by Navigator is fresh water, as none of its industrial units requires desalination.

	<b>303-4 Effluents</b>	
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	2017	2018	2019
<b>Total effluents (1 000 m³)</b>	56,418	52,548	55,045
<b>Total Suspended Solids (t)</b>	817	1,089	1,130
<b>Chemical Oxygen Demand (COD) (t)</b>	17,128	16,193	16,869
<b>Biochemical Oxygen Demand (BOD) (t)</b>	755	754	846
<b>Halogenated Chemical Compounds (AOX) (t)</b>	232	194	218
<b>Total Nitrogen (t)</b>	115	132	150
<b>Total Phosphorous (t)</b>	135	109	111

Navigator only makes discharges into surface water and seawater. At the industrial complexes in Setúbal and Vila Velha de Ródão, all effluent is discharged into the Sado Estuary and the Tagus reservoir, respectively. At the Figueira da Foz and Aveiro industrial complexes, all effluent is discharged into seawater.



GRI STANDARD	RESPONSE	LOCATION
	Effluent undergoes primary and secondary treatment at the industrial complexes in Setúbal, Figueira da Foz and Aveiro, whilst in Vila Velha de Ródão industrial effluent is treated using an advanced primary and secondary treatment system. Substances considered by ECHA (European Chemicals Agency, the relevant EU authority) as of very high concern are regularly monitored and are reported whenever detected in effluents, even in quantities below the quantification limits in the analytical methods, due to the high volume of outflow.	

### 303-5 Water Consumption

In accordance with the methodology described in guidance for disclosure 303-5, the volume of water consumed corresponds to the differential between the volume of water withdrawn and the volume of water discharged. In Navigator's case, the volume of water consumed according to this methodology is 13,496 (1000 m<sup>3</sup>), corresponding to approximately 20% of the water withdrawn. It should be noted that this figure includes a portion which is not counted, i.e. the water discharged as steam, as this is not measurable but is in fact returned to the environment.

## BIODIVERSITY

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Forest Management", chapters 3.1.2 and 4.1.	Page 56 Page 81
	<b>103-2 The management approach and its components</b> Chapter 3.1.2 Protection of Natural Resources. Chapter 4.1 Sustainable Forest Management.	Pages 56-59 Pages 81-85
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 304 - Biodiversity: 2016</b>	<b>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</b>				
		<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>% of total natural heritage 2019</b>
	<b>National Network of Protected Areas (RNAP) (ha)</b>	9,343	8,677	10,510	20%
	<b>Classified sites in the Natura 2000 Network (ha)</b>	43,480	42,968	43,368	81%
	<b>Special Protection Zones (ZPE) in the Natura 2000 Network (ha)</b>	30,680	31,147	31,396	58%
	<b>Total classified areas (ha)</b>	53,416	52,581	53,770	50%
	<b>304-2 Significant impacts of activities, products, and services on biodiversity</b> There is no record of any occurrences with significant impacts. The potential impacts on biodiversity, negative or positive, are duly identified, and preventive and mitigation measures have been defined for the potential negative impacts. Measures are also implemented to help maintain or improve the biodiversity existing on our land holdings and its state of conservation. These measures are implemented in forestry projects and operations, from planning through to execution.				

### 304-3 Habitats protected or restored

	2017	2018	2019
<b>Protected habitats (ha)</b>	3,706.4	4,205.5	4,113.9
<b>Restored habitats (ha)</b>	51.9	71.2	47.6
<b>Total protected or restored habitats (ha)</b>	3,758.3	4,276.7	4,161.5

Total of 46 habitats classified in the Natura 2000 Network, including eleven priority habitats.

GRI STANDARD	RESPONSE	LOCATION		
	<b>304-4 Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations</b>			
		<b>2017</b> <b>2018</b> <b>2019</b>		
	<b>Critically endangered</b>	3	3	3
	<b>Endangered</b>	12	13	13
	<b>Vulnerable</b>	26	27	27
	<b>Near threatened</b>	19	19	19
	<b>Least concern</b>	164	171	168

The Navigator Company identifies, maps and characterises the wildlife found on the holdings under its management. Specific methods are applied which involve gathering information to serve as the basis for putting into practice the most appropriate management guidelines. Navigator assesses the biodiversity on its estates on the basis of surveys of habitats fauna and flora in groups selected in advance as bioindicators (species of flora and habitats, fish whenever possible, reptile, amphibians, birds and mammals) and by mapping areas of interest to biodiversity conservation. Whenever possible, information is also recorded on butterflies and other invertebrate groups.  
The tools used by Navigator to conserve biodiversity include the Biodiversity Assessment Techniques Manuals and the Conservation Action Plans, documents prepared internally and presenting the most important relevant information on potential biodiversity and the conservation measures to be applied in each case.

## EMISSIONS

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to topics "Energy and Climate", chapters 3.1.1 and 4.2, and "Industrial Environmental Management", chapter 4.3.	Pages 52, 87 and 93
	<b>103-2 The management approach and its components</b> Chapter 3.1.1 Climate Change. Chapters 4.2 Energy and Climate and 4.3 Industrial Environmental Management.	Page 52 Pages 87-91 Pages 93-96
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 305 - Emissions: 2016</b>	<b>305-1 Direct GHG emissions (Scope 1)</b>			
		<b>2017</b>	<b>2018</b>	<b>2019</b>
	<b>Power generation (t CO<sub>2</sub>eq)</b>	596,875	603,423	579,253
	<b>Physical-chemical processes (t CO<sub>2</sub>eq)</b>	7,679	9,318	8,274
	<b>Other combustion processes (t CO<sub>2</sub>eq)</b>	132,011	156,874	164,495
	<b>Total (t CO<sub>2</sub>eq)</b>	736,565	769,615	752,023

Direct greenhouse gas emissions include CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O. At the date of publication of this report, the 2019 emissions had not yet been verified in EETS.

### 305-2 Energy indirect (Scope 2) GHG emissions

All the energy consumed at The Navigator Company's industrial units was supplied by the power plants.

### 305-3 Other indirect (Scope 3) GHG emissions

	2017	2018	2019
<b>Wood transport (t CO<sub>2</sub>eq)</b>	55,365	56,260	60,548
<b>Paper transport (t CO<sub>2</sub>eq)</b>	78,804	88,809	74,998
<b>Total (t CO<sub>2</sub>eq)</b>	134,169	145,069	135,545

**305-4 GHG emissions intensity**

	2017	2018	2019
<b>GHG emissions intensity (t CO<sub>2</sub>/t)</b>	0.228	0.245	0.246

**305-5 Reduction of GHG emissions**

As a producer of electricity from renewable sources (biomass and solar), The Navigator Company avoids each year emissions of approximately 418,375 t CO<sub>2</sub>. This figure depends on the mix (emission factor) used by the power sales company. The Navigator Company is Portugal's leading producer of renewable energy from biomass.

**305-6 Emissions of ozone-depleting substances**

	2017	2018	2019
<b>Ozone-depleting substances (kg)</b>	19	0	0

The Navigator Company has an inventory of all the equipment using ozone-depleting substances. In order to minimise and avoid emissions of these substances into the atmosphere, a strict preventive maintenance plan is implemented for cooling equipment, in line with the legal requirements. This plan also provides for the possibility of replacing cooling fluids containing HCFCs with others without any impact on the ozone layer. Emissions of ozone-depleting substances occurred at the Aveiro and Vila Velha de Ródão plants, insofar as at the other units all equipment that previously used ozone-depleting gases has been replaced.

**305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions**

	2017	2018	2019
<b>NOx (t)</b>	2,276	2,025	1,714
<b>SO<sub>2</sub> (t)</b>	668	322	354
<b>Particles (t)</b>	484	437	269

**EFFLUENTS AND WASTE**

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Industrial Environmental Management", chapters 3.1.2 and 4.3	Pages 54-55 Page 93
	<b>103-2 The management approach and its components</b> Chapter 3.1.2 Protection of Natural Resources. Chapter 4.3 Industrial Environmental Management.	Pages 54-55 Pages 93-96
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 306 - Effluents and Waste: 2018</b>	<b>306-1 Water discharge by quality and destination</b> Effluents was included in the new GRI Standard 303 (2018), corresponding to Water resources, and will no longer be addressed in GRI Standard 306 Effluents and Waste. This report therefore responds to this indicator under indicator GRI 303-4.
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**306-2 Waste by type and disposal method**

	2017	2018	2019
<b>Total waste generated (t)</b>	276,834	307,115	385,948
<b>Hazardous waste (t)</b>	427	603	1,247
<b>Non-hazardous waste (t)</b>	276,408	306,512	384,701
<b>Reclaimed (t)</b>	233,012	244,107	309,866
<b>Disposed of (t)</b>	43,822	63,008	76,082
<b>Recovery rate (%)</b>	84%	79%	80%

**306-3 Significant spills**

	2017	2018	2019
<b>Total number of significant spills (Nº)</b>	0	0	0
<b>Total volume of significant spills (m<sup>3</sup>)</b>	0	0	0

**306-4 Transport of hazardous waste**

Not applicable.

**306-5 Water bodies affected by water discharges and/or runoff**

Effluents was included in the new GRI Standard 303 (2018), corresponding to Water resources, and will no longer be addressed in GRI Standard 306 Effluents and Waste. This report therefore responds to this indicator under indicator GRI 303-2.

**ENVIRONMENTAL COMPLIANCE**

<b>GRI 103 - Management Approach: 2016</b>	Topic to which a reply is mandatory under Decree-Law 89/2017 for which The Navigator Company has no Management Approach, replying only to the associated GRI indicator.
<b>GRI 307 - Environmental Compliance: 2016</b>	<b>307-1 Non-compliance with environmental laws and regulations</b> No significant fines or penalties (in excess of € 3,000) were recorded during 2019.

**SUPPLIER ENVIRONMENTAL ASSESSMENT**

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6.	Page 111
	<b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management.	Pages 111-115
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	
<b>GRI 308 - Supplier Environmental Assessment: 2016</b>	<b>308-1 New suppliers that were screened using environmental criteria</b> Chapter 4.6 Sustainable Supplier Management.	Page 113
	<b>308-2 Negative environmental impacts in the supply chain and actions taken</b> Nothing to report.	

**SOCIAL STANDARDS**

**EMPLOYMENT**

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to topic "Talent Management and Developing Human Capital", chapters 3.1.5 and 4.4.	Page 64 Page 99
	<b>103-2 The management approach and its components</b> Chapter 3.1.5 The Social Challenge. Chapter 4.4 Talent Management and Developing Human Capital.	Pages 64-65 Pages 99-103
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

GRI STANDARD	RESPONSE	LOCATION						
<b>GRI 401 - Employment: 2016</b>	<b>401-1 New employee hires and employee turnover</b>							
	<b>New employee hires and employee turnover during the reporting period</b>							
		<b>Gender</b>	<b>Starters</b>			<b>Employees leaving</b>		
			<b>&lt;30</b>	<b>30-50</b>	<b>&gt;50</b>	<b>&lt;30</b>	<b>30-50</b>	<b>&gt;50</b>
	<b>Portugal</b>	Men	71	47	1	23	34	75
		Women	21	29	0	11	16	8
		Subtotal	92	76	1	34	50	83
	<b>Other countries</b>	Men	0	3	0	0	5	2
		Women	0	2	1	0	3	1
		Subtotal	0	5	1	0	8	3
	<b>Employees joining and leaving, by age range</b>	<b>92</b>	<b>81</b>	<b>2</b>	<b>34</b>	<b>58</b>	<b>86</b>	
<b>Employees joining and leaving, by gender</b>	Men	122			139			
	Women	53			39			
<b>Employees joining and leaving, by region</b>	Portugal	169			167			
	Other countries	6			11			
	<b>Total employees joining and leaving</b>	175			178			
	<b>New employee hires and turnover in reporting period</b>							
		<b>Gender</b>	<b>Starters</b>			<b>Employees leaving</b>		
			<b>&lt;30</b>	<b>30-50</b>	<b>&gt;50</b>	<b>&lt;30</b>	<b>30-50</b>	<b>&gt;50</b>
<b>Portugal</b>	Men	25.0%	3.2%	0.1%	8.1%	2.3%	8.9%	
	Women	25.3%	11.0%	0.0%	13.3%	6.1%	7.5%	
	Subtotal	25.1%	4.4%	0.1%	9.3%	2.9%	8.7%	
<b>Other countries</b>	Men	0.0%	12.0%	0.0%	0.0%	20.0%	9.1%	
	Women	0.0%	8.3%	9.1%	0.0%	12.5%	9.1%	
	Subtotal	0.0%	10.2%	3.0%	0.0%	16.3%	9.1%	
	<b>Turnover rate, by age range</b>	<b>25.0%</b>	<b>4.6%</b>	<b>0.2%</b>	<b>9.2%</b>	<b>3.3%</b>	<b>8.7%</b>	
<b>Turnover rate, by gender</b>	Men	4.6%			5.3%			
	Women	10.8%			8.0%			
<b>Turnover rate, by region</b>	Portugal	5.6%			5.5%			
	Other countries	7.2%			13.3%			
	<b>Total turnover rate</b>	5.6%			5.7%			

**401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees**

The Navigator Company does not normally hire part-time staff, and there is consequently no specific policy or practice in place for benefits for workers employed on this basis. Benefits provided to the Company's Employees include:

- Nursery school allowance
- School textbooks allowance
- Allowance for Employees with disabled children
- Life insurance (for all Portuguese Employees)
- Health insurance for Employees, covering their families
- Complementary welfare insurance (accident at work/occupational disease) in some companies
- Pension Plan in some companies
- Rejuvenation programme with compensation payments
- Special terms with telecommunications companies
- Special terms with fuel companies

GRI STANDARD	RESPONSE	LOCATION		
	<b>401-3 Parental leave</b>			
		<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>N°. employees returning to work after parental leave</b>	Men	90	116	95
	Women	17	13	20
	Total	107	129	115
<b>N°. employees returning to work after parental leave</b>	Men	90	116	95
	Women	17	13	20
	Total	107	129	115
<b>N°. of employees who returned to work and were still employed 12 months later</b>	Men	98	90	116
	Women	16	17	13
	Total	114	107	129
<b>Return to work rate</b>	Men	100%	100%	100%
	Women	100%	100%	100%
	Total	100%	100%	100%
<b>Retention rate (12 months)</b>	Men	100%	100%	100%
	Women	100%	100%	100%
	Total	100%	100%	100%

NB: Employees who took parental leave starting in one calendar year are recorded as having returned that same year, even if their leave extended into the next calendar year. In keeping with the same logic, the number of those still employed 12 months later is assessed in year n+1 in relation to the year of the child's birth.

**OCCUPATIONAL HEALTH AND SAFETY**

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Occupational Health and Safety", chapter 4.5.	Page 105
	<b>103-2 The management approach and its components</b> Chapter 4.5 Occupational Health and Safety.	Pages 105-109

**103-3 Evaluation of the management approach**  
The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.

**GRI 403 - Occupational Health and Safety: 2018**  
**403-1 Occupational Health and Safety management system**  
The Navigator Company has an Occupational Health and Safety Management System - OSHAS 18001 - which encompasses all the Company's industrial and forestry operations. The transition to ISO 45001 is currently under way.

**403-2 Hazard identification, risk assessment, and incident investigation**  
Hazards are identified and risks assessed by the teams responsible for operations, in direct coordination with the Occupational Health and Safety (OHS) teams, with recourse whenever necessary to internal and external consultancy services. The results of these processes are assessed through internal and external audits, as well as inspections and checks, by official entities and by internal teams. Monitoring is conducted on the basis of performance indicators, so that it is possible to follow up the results of processes. In terms of reporting, all Employees are able to report any hazards, hazardous situations or safety incidents, anonymously if they so wish. Navigator has several procedures in place, such as PG28 - Reporting and Investigation of Incidents, as well as the Codes of Ethics and Conduct, which make it possible to protect Employees against any reprisals. Incidents at work are analysed in accordance with PG28 - Reporting and Investigation of Incidents, as well as the procedures for Hazard Identification and Risk Assessment.

**403-3 Occupational Health Services**  
Teams that perform tasks with supervision from the Occupational Health and Safety (OHS) team ensure that hazards are identified and eliminated and that risks are minimised. The OHS team contacts all operational teams directly. Information is provided through internal communication channels and the hazard identification and risk assessment forms are printed and distributed to the different sectors. With regard to service quality, the powers/responsibilities of the OHS teams are duly defined, and training programmes for all Employees in OHS issues are constantly updated.

**403-4 Worker participation, consultation, and communication on Occupational Health and Safety**

Employees are consulted through the Occupational Health and Safety (OHS) Committee or, where no such committee exists, all the Employees are involved in a consultation exercise. The issues raised relate to a variety of OHS topics, including the issue of information provided, knowledge of risks, etc. Information is made available in several ways: OHS Committees, leaflets, articles in Company magazine and internal channels. The Board and Employees' Councils meet at least three times a year and address various OHS issues in the Company - ranging from the main concerns to projects in progress and new projects. On critical topics, these councils are always consulted and their recommendations are binding. Where no such council exists, the relevant information is conveyed to the teams.

**403-5 Worker training on Occupational Health and Safety**

Navigator has an annual OHS training and awareness raising programme for all Employees. Courses are already available on the e-learning platform, and new course content is being developed. There are also compulsory face-to-face training sessions and, in specific cases, such as hazardous activities or situations, this training is provided on an individual basis. At the Industrial Challenge sessions, OHS is a compulsory topic and group dynamics are organised to raise awareness of emergency situations, risk assessment and hazardous situations.

**403-6 Promotion of worker health**

Navigator has round-the-clock Medical Units (at the industrial sites in Setúbal, Figueira da Foz and Aveiro) with a team of doctors (occupational and curative medicine) and nurses. Any Navigator Employee has access to the health care needed. In addition, the Company provides all Employees with health insurance covering other types of needs. The Company runs an Occupational Health Programme for all Employees, with a permanent Occupational Health team (psychologist, nutritionist, physiotherapist and social worker), offering not only appointments with these professionals at the different medical units but also initiatives targeted at the needs and specific features of the Company's different areas of operation. Further information in chapter 4.5 Occupational Health and Safety.

Pages 105-109

**403-7 Prevention and mitigation of Occupational Health and Safety impacts directly linked by business relationships**

Percentage of employees whose work or workplace is controlled by the organisation and who are represented on joint health and safety committees (Board-Employees)	Setúbal	36.10%
	Fig. da Foz	31.50%
	Aveiro	13.60%
	V.V. Ródão	7.10%

**403-8 Workers covered by an Occupational Health and Safety management system**

	Número	%
Number and percentage of employees and workers who are not employed, but whose work and/or workplace is controlled by the organisation, and who are covered by the management system.	71	100%
Number and percentage of employees and workers who are not employed, but whose work and/or workplace is controlled by the organisation, and who are covered by the management system which has been audited internally.	66	93%
Number and percentage of employees and workers who are not employed, but whose work and/or workplace is controlled by the organisation, and who are covered by the management system which has been audited or certified by an external party.	5	7%

**403-9 Work-related injuries**

<b>In accordance with Single Report (Ministerial Order [Portaria] 55/2010, of 21 January)</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Injury rate</b>	9.5	10.6	7.8
<b>Lost day rate</b>	328.1	455.7	459.0
<b>In accordance with GRI standards</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Rate of fatalities as a result of work-related injury</b>	0.0	0.0	0.0
<b>Rate of high-consequence work-related injuries (excluding fatalities)</b>	0.0	0.0	0.0
<b>Rate of recordable work-related injuries</b>	23.1	24.2	19.2

**Formulas used:**

**Single Report Formulas**

- > Frequency rate = (Number of accidents leading to sick leave / Number of hours worked) x 1,000,000
- > Severity rate = (Number of days lost / Number of hours worked) x 1,000,000

**GRI Formulas**

- > Rate of fatalities as a result of work-related injury = (no. of fatalities as a result of work-related injury/no. of hours worked) x 1,000,000
- > Rate of high-consequence work-related injuries\* (excluding fatalities) = (High consequence work related injuries (excluding fatalities)/Number of hours worked x 1,000,000
- \*injury from which the worker takes more than 6 months to make a full recovery, or never recovers fully to pre-injury health status (e.g. amputation)
- > Rate of work-related injuries\*\* = (work-related injuries/no. of hours worked) x 1,000,000
- \*\* All work-related injuries

**403-10 Work-related ill health**

The Navigator Company's industrial operations involve a series of risks which are constantly monitored; preventive measures are also adopted at the different industrial units. Attention is drawn to the risks of pulmonary diseases, dermatitis, musculoskeletal diseases, conjunctivitis and deafness. No fatalities occurred in 2019 as a result of this type of ill health, and eight cases of work-related ill health were recorded. The instances of ill health recorded were the result essentially of factors such as industrial noise, straining of upper limbs through repetitive movements or monotonous work and raising upper limbs above 90 degrees.

**TRAINING AND EDUCATION**

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to topic "Talent Management and Developing Human Capital", chapter 4.4.	Page 99
	<b>103-2 The management approach and its components</b> Chapter 4.4 Talent Management and Developing Human Capital.	Pages 99-103
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

**GRI 404 - Training and Education: 2018**  
**404-1 Average hours of training per year per employee**

		2017	2018	2019
<b>Top Management</b>	Men	44	19	17
	Women	97	37	32
	Total	49	20	18
<b>Senior Management</b>	Men	82	43	50
	Women	83	50	60
	Total	82	45	54
<b>Middle Management</b>	Men	50	28	59
	Women	52	54	39
	Total	50	33	55
<b>Operatives</b>	Men	57	76	65
	Women	18	63	32
	Total	53	75	61
<b>TOTAL</b>	Men	59	66	61
	Women	48	57	44
	Total	58	65	59

In 2019, in addition to 182,740 hours of training by permanent Employees, the Learning Center provided a further 41,885 hours of training to 50 trainees on training courses for new production and industrial maintenance technicians who will join the workforce of Navigator Group companies as from 01 January 2020.

**404-2 Programs for upgrading employee skills and transition assistance programs**  
 All The Navigator Company's staff is covered by the Training Plan and respective addenda, which are made from time to time as needs arise. They are accordingly involved in a process of continuous learning, designed to improve their skills and adapt them to the Company's needs. The Learning Center platform continues to be an important tool, and can be accessed by all Employees, offering a wide variety of online training courses. This platform also provides information on all training courses offered and the respective schedules, as well as onboarding for new Employees when they join the Company.  
 For Employees approaching retirement age, The Navigator Company offers a compensation package under its Rejuvenation Programme for those wishing to take early retirement. This is intended to support them in the transition to a new phase in their lives in which they may face new personal and professional challenges.

**404-3 Percentage of employees receiving regular performance and career development reviews**

		2017	2018	2019
<b>Top Management</b>	Men	100%	100%	96%
	Women	100%	100%	100%
	Total	100%	100%	96%
<b>Senior Management</b>	Men	96%	97%	98%
	Women	92%	96%	95%
	Total	95%	97%	97%
<b>Middle Management</b>	Men	98%	100%	97%
	Women	100%	100%	94%
	Total	99%	100%	97%
<b>Operatives</b>	Men	98%	98%	99%
	Women	98%	100%	97%
	Total	98%	99%	99%
<b>TOTAL</b>	Men	98%	98%	98%
	Women	96%	98%	96%
	Total	98%	98%	98%

Because performance assessments are only concluded in March/April (after review and any adjustment required), the information reported each year refers to the previous year's assessment.

The assessment data does not include the assessments of managers allocated to companies outside the reporting scope (Portucel Moçambique), or of those who have since left the Company.

**DIVERSITY AND EQUAL OPPORTUNITY**

**GRI 103 - Management Approach: 2016**  
**103-1 Explanation of the material topic and its Boundary**  
 Related to topic "Talent Management and Developing Human Capital", chapters 3.1.5 and 4.4.      Page 64  
 Page 99

**103-2 The management approach and its components**  
 Chapter 3.1.5 The Social Challenge.      Pages 64-65  
 Chapter 4.4 Talent Management and Developing Human Capital.      Pages 99-103

**103-3 Evaluation of the management approach**  
 The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.

**GRI 405 - Diversity and Equal Opportunity 2016**  
**405-1 Diversity of governance bodies and employees**  
**Breakdown by employee category and gender**

		2017	2018	2019
<b>Governance bodies</b>	Men	100.0%	100.0%	76.9%
	Women	0.0%	0.0%	23.1%
<b>Top Management</b>	Men	91.6%	91.1%	88.5%
	Women	8.4%	8.9%	11.5%
<b>Senior Management</b>	Men	67.0%	66.5%	64.2%
	Women	33.0%	33.5%	35.2%
<b>Middle Management</b>	Men	85.3%	82.6%	81.9%
	Women	14.7%	17.4%	18.1%
<b>Administrative</b>	Men	33.8%	31.4%	36.3%
	Women	66.2%	68.6%	63.7%
<b>Operatives</b>	Men	96.6%	95.1%	95.1%
	Women	3.4%	4.9%	4.9%

**Breakdown by employee category and age range**

		2017	2018	2019
<b>Governance bodies</b>	<30	0.0%	0.0%	0.0%
	30 a 50	21.4%	23.1%	23.1%
	>50	78.6%	76.9%	76.9%
<b>Top Management</b>	<30	0.0%	0.0%	0.0%
	30 a 50	28.3%	28.6%	34.4%
	>50	71.7%	71.4%	65.6%
<b>Senior Management</b>	<30	11.9%	12.8%	13.1%
	30 a 50	58.7%	59.7%	60.5%
	>50	29.4%	27.5%	26.4%
<b>Middle Management</b>	<30	1.4%	5.2%	4.4%
	30 a 50	40.3%	38.3%	43.6%
	>50	58.3%	56.5%	52.0%
<b>Administrative</b>	<30	7.3%	5.4%	3.6%
	30 a 50	47.5%	47.5%	46.9%
	>50	45.2%	47.1%	49.5%
<b>Operatives</b>	<30	11.9%	13.8%	13.7%
	30 a 50	59.8%	59.1%	59.1%
	>50	28.3%	27.1%	27.2%



GRI STANDARD	RESPONSE	LOCATION	
<b>405-2 Ratio of basic salary and remuneration of women to men</b>			
	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Top Management</b>	0.79	0.78	0.77
<b>Senior Management</b>	0.72	0.72	0.71
<b>Middle Management</b>	0.72	0.67	0.65
<b>Administrative</b>	1.02	0.96	1.08
<b>Operatives</b>	0.54	0.61	0.63

There is no pay gap between women and men in any employee category. The payroll data used to calculate the ratio takes into consideration all remuneration received by Employees (including allowances for shift work, overtime, public holidays, etc.). Consideration is also given to factors relating to: length of service (which leads to different pay levels, known as salary grades), distinctions between the companies from which The Navigator Company was formed, year of hiring and other criteria.

## NON-DISCRIMINATION

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to topic "Talent Management and Developing Human Capital".	Page 99
	<b>103-2 The management approach and its components</b> Chapter 4.4 Talent Management and Developing Human Capital.	Pages 99-103
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 406 - Non-Discrimination: 2016</b>	<b>406-1 Incidents of discrimination and corrective actions taken</b> A whistleblowing report alleged the existence of discriminatory treatment at one of the Company's units. The matter was investigated and the report found to be groundless. The Navigator Company assigns fundamental importance to these issues, and for this reason conducted an in-depth review in 2017 of the related internal instruments, which include:  <ul style="list-style-type: none"> <li>&gt; Code of Ethics and Good Conduct;</li> <li>&gt; Whistleblowing Regulations;</li> <li>&gt; Code of Good Conduct for Preventing and Combating Workplace Harassment.</li> </ul>	
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## FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6.	Page 111
	<b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management.	Pages 111-115
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 407 - Freedom of Association and Collective Bargaining 2016</b>	<b>407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk</b> This risk was not identified in any operation or supplier. The Navigator Company assigns fundamental importance to these issues, and for this reason conducted an in-depth review in 2017 of the related internal instruments, which include:  <ul style="list-style-type: none"> <li>&gt; Code of Ethics and Good Conduct;</li> <li>&gt; Whistleblowing Regulations;</li> <li>&gt; Code of Conduct for Suppliers.</li> </ul>	
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GRI STANDARD	RESPONSE	LOCATION
<b>CHILD LABOUR</b>		
<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6.	Page 111
	<b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management.	Pages 111-115
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 408 - Child labour: 2016</b>	<b>408-1 Operations and suppliers at significant risk for incidents of child labour</b> This risk was not identified in any operation or supplier. The Navigator Company assigns fundamental importance to these issues, and for this reason conducted an in-depth review in 2017 of the related internal instruments, which include:  <ul style="list-style-type: none"> <li>&gt; Code of Ethics and Good Conduct;</li> <li>&gt; Whistleblowing Regulations;</li> <li>&gt; Code of Conduct for Suppliers.</li> </ul>	
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## FORCED OR COMPULSORY LABOUR

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6.	Page 111
	<b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management.	Pages 111-115
	<b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.	

<b>GRI 409 - Forced or Compulsory Labour: 2016</b>	<b>409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour</b> This risk was not identified in any operation or supplier. The Navigator Company assigns fundamental importance to these issues, and for this reason conducted an in-depth review in 2017 of the related internal instruments, which include:  <ul style="list-style-type: none"> <li>&gt; Code of Ethics and Good Conduct;</li> <li>&gt; Whistleblowing Regulations;</li> <li>&gt; Code of Conduct for Suppliers.</li> </ul>	
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## SECURITY PRACTICES

<b>GRI 103 - Management Approach: 2016</b>	Topic to which a reply is mandatory under Decree-Law 89/2017 for which The Navigator Company has no Management Approach, replying only to the associated GRI indicator.	
<b>GRI 410 - Security Practices: 2016</b>	<b>410-1 Security personnel trained in human rights policies or procedures</b> The Navigator Company uses security services provided by private security firms, duly licensed by the Ministry of Internal Administration, which address human rights issues in their staff training.	

## HUMAN RIGHTS ASSESSMENT

<b>GRI 103 - Management Approach: 2016</b>	<b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6.	Page 111
	<b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management.	Pages 111-115

GRI STANDARD	RESPONSE	LOCATION
	<p><b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.</p>	
<b>GRI 412 - Human Rights Assessment: 2016</b>	<p><b>412-1 Operations that have been subject to human rights reviews or impact assessments</b> The Company is planning to conduct this assessment.</p> <p><b>412-2 Employee training on human rights policies or procedures</b> The Company is planning to provide its Employees with training in this area.</p> <p><b>412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening</b> The tender specifications issued by The Navigator Company in procuring products and services include a series of obligations for selected contractors, which include human rights clauses.</p>	

## LOCAL COMMUNITIES

<b>GRI 103 - Management Approach: 2016</b>	<p><b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Community Engagement", chapters 3.1.5 and 4.8.</p> <p><b>103-2 The management approach and its components</b> Chapter 3.1.5 The Social Challenge. Chapter 4.8 Community Engagement.</p> <p><b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.</p> <p><b>413-1 Operations with local community engagement, impact assessments, and development programs</b> Chapter 4.8 Community Engagement.</p>	<p>Page 64 Page 123</p> <p>Pages 64-66 Pages 123-128</p> <p>Pages 123-128</p>
<b>GRI 413 - Local Communities: 2016</b>	<p><b>413-2 Operations with significant actual and potential negative impacts on local communities</b> Chapter 4.8 Community Engagement.</p>	<p>Pages 123-128</p>

## SUPPLIER SOCIAL ASSESSMENT

<b>GRI 103 - Management Approach: 2016</b>	<p><b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Sustainable Supplier Management", chapter 4.6.</p> <p><b>103-2 The management approach and its components</b> Chapter 4.6 Sustainable Supplier Management.</p> <p><b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.</p>	<p>Page 111</p> <p>Pages 111-115</p>
<b>GRI 414 - Supplier Social Assessment: 2016</b>	<p><b>414-1 New suppliers that were screened using environmental criteria</b> Chapter 4.6 Sustainable Supplier Management.</p> <p><b>414-2 Negative environmental impacts in the supply chain and actions taken</b> Navigator has not identified any significant negative social impacts in its supply chain.</p>	<p>Pages 111-115</p>

## MARKETING AND LABELLING

<b>GRI 103 - Management Approach: 2016</b>	<p><b>103-1 Explanation of the material topic and its Boundary</b> Related to the topic "Customer Satisfaction", chapter 4.7.</p> <p><b>103-2 The management approach and its components</b> Chapter 4.7 Customer Satisfaction.</p>	<p>Page 117</p> <p>Pages 117-120</p>
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GRI STANDARD	RESPONSE	LOCATION
	<p><b>103-3 Evaluation of the management approach</b> The Navigator Company regularly monitors and assesses indicators associated with this topic. In order to assess the effectiveness of our management, we also rely on feedback from our stakeholders, benchmarking exercises and external performance ratings, whenever available.</p>	
<b>GRI 417 - Marketing and labelling: 2016</b>	<p><b>417-1 Requirements for product and service information and labelling</b> The Navigator Company complies with Regulation (EU) 453/2010, of 20 May, publishing a technical safety sheet for each product detailing its main features, applications and recommendations for use and recycling.</p> <p><b>417-2 Incidents of non-compliance concerning product and service information and labelling</b> The Navigator Company has not identified any instances of non-compliance in the labelling of products and services.</p> <p><b>417-3 Incidents of non-compliance concerning marketing communications</b> The Navigator Company has not identified any instances of non-compliance relating to marketing communications.</p>	

## PUBLIC POLICY

<b>GRI 103 - Management Approach: 2016</b>	<p>Topic to which a reply is mandatory under Decree-Law 89/2017 for which The Navigator Company has no Management Approach, replying only to the associated GRI indicator.</p>
<b>GRI 415 - Public Policy: 2016</b>	<p><b>415-1 Political contributions</b> The Navigator Company makes no contributions to political parties.</p>

## SOCIOECONOMIC COMPLIANCE

<b>GRI 103 - Management Approach: 2016</b>	<p>Topic to which a reply is mandatory under Decree-Law 89/2017 for which The Navigator Company has no Management Approach, replying only to the associated GRI indicator.</p>
<b>GRI 419 - Socioeconomic compliance: 2016</b>	<p><b>419-1 Non-compliance with laws and regulations in the social and economic area</b> No significant fines or penalties (in excess of ₺ 3,000) were recorded during 2019.</p>