

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31 DECEMBER 2025**

### **INTRODUCTION FROM THE DIRECTORS**

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 (the “Act”) by the directors (together, the “Board”) of Navig8 Europe Limited, a company organised and existing under the laws of England and Wales (“Navig8”, and together with all other relevant affiliated entities to whom the provisions of the Act applies, the “Group”).

Navig8 Group is a fully integrated provider of shipping management and brokerage services and the world’s largest independent pool and commercial management company. As an experienced ship owner and operator, Navig8 Group is also an active charterer, which enables the organisation to offer a range of employment optionality to owners.

Navig8’s Anti-Slavery and Human Trafficking Policy demonstrates Navig8 Group’s commitment to:

- (a) acting ethically and with integrity in its business relationships; and
- (b) implementing and enforcing effective systems and processes,

to ensure neither modern slavery nor human trafficking takes place anywhere in its own business or throughout its supply chains.

Navig8 has a zero-tolerance policy for slavery and human trafficking and is committed to respecting the rights and dignity of all people, and to operating in accordance with the Act.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of its Global Business Conduct Guidelines, Navig8’s Anti-Slavery and Human Trafficking Policy details its commitment to identifying any potential risk areas across its supply chains and to protecting any whistle blowers if any such Anti-Slavery and Human Trafficking risks are found and reported. Navig8 encourages transparency and will support any member of staff raising genuine concerns.

Navig8 Group requires all staff members to have read, understood and comply with its Anti-Slavery and Human Trafficking Policy. Navig8 takes a zero-tolerance approach to non-compliance; any breaches of this policy will result in disciplinary action and/or dismissal (if appropriate).

One of Navig8’s key objectives is to be an equal opportunities employer in all respects, and the Group endeavours to promote job applications from all sections of the community. Part of the recruitment process includes eligibility checks to ensure staff are safeguarded against human trafficking or being forced to work against their will.

Navig8 regularly reviews (and updates where necessary) all of its policies to ensure their suitability and relevance to its business activities. Such policies, including any updates to them from time to time, are regularly communicated to all staff members.

### **RISK ASSESSMENT – SUPPLY CHAINS**

As a result of robust due diligence and ongoing compliance with all applicable laws and regulations, Navig8’s Board and management teams consider there is minimal risk that any business functions of Navig8 could support, or be complicit in, slavery and human trafficking. Accordingly, the key risk areas are within Navig8 Group’s wider supply chain. The greatest risk of modern slavery in Navig8 Group’s supply chains arises when dealing with companies based in jurisdictions which do not have similar or equivalent standards and legislation to the UK. Such risk is minimised by way of Navig8 Group’s “know

your counterparty” procedures and ongoing due diligence, which is supported by mandatory internal training and robust policies (in each case as further elaborated below).

### **COUNTERPARTY ADHERENCE TO NAVIG8 VALUES AND ETHICS**

Navig8 does not and will not knowingly support any business involved in slavery or human trafficking. Navig8 requires its suppliers and contractors to ensure they do not use forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Suppliers are expected to hold their own suppliers to the same standards as those of Navig8. Navig8 will cease to conduct further business with a counterparty that cannot demonstrate its efforts to meet these standards.

### **NAVIG8 COUNTERPARTY CODE**

Navig8’s legal department maintains a Business Counterparty Code (the “**Navig8 Counterparty Code**”) which sets out Navig8 Group’s policy against modern slavery and human trafficking practices, as well as its policies on other business compliance matters. Navig8 expects and requires its business partners, contractors, sub-contractors, suppliers, counterparties and agents (together, “**Counterparties**” and each a “**Counterparty**”) to share its commitment to operating in compliance with the Act and adhere to the standards and values as set out in the Navig8 Counterparty Code.

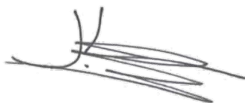
The Navig8 Counterparty Code includes, amongst other things, a commitment from Counterparties that they shall conduct their activities in compliance with the Act and the UN Universal Declaration of Human Rights, including without limitation, refusing the use of forced, compulsory or trafficked labour, refusing to tolerate workplace discrimination, harassment or abuse, and providing work conditions and standards that meet or exceed applicable legal standards and regulations. According to the Navig8 Counterparty Code, Counterparties are also expected to hold their own suppliers, employees and counterparties to the same standards.

Navig8 is looking to include acknowledgement of the Navig8 Counterparty Code as a key part of the onboarding (KYC) process for prospective new Counterparties. Navig8 has already reached out to existing suppliers and requested that they sign up to the Navig8 Counterparty Code.

### **TRAINING**

To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking throughout its supply chains and business, training on Navig8’s modern slavery policy forms part of the mandatory induction process for all staff members, and further training is provided as necessary on an ongoing basis, and/or upon request by any individual member of staff.

This statement is made pursuant to section 54(1) of the Act and constitutes Navig8’s slavery and human trafficking statement for the financial year ending 31 December 2025. The directors of Navig8 approved this statement on the date set out below.



Jonathan Keats, Director

Date: 30 June 2026