

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 2020**

### **INTRODUCTION FROM THE DIRECTORS**

Navig8 Group is a fully integrated provider of shipping management services and the world's largest independent pool and commercial management company. As an experienced ship owner and operator, we are also an active charterer, enabling us to offer employment optionality to owners. The Group has over 360 employees worldwide and operates in 13 countries.

Navig8 Europe Ltd and Navig8 Chemicals Europe Ltd ("**Navig8**") are subject to the UK Modern Slavery Act 2015.

Navig8's Anti-Slavery and Human Trafficking Policy demonstrates our commitment to:

- Acting ethically and with integrity in our business relationships, and
- Implementing and enforcing effective systems and processes,

to ensure modern slavery or human trafficking is not taking place anywhere in our own business or in any of our supply chains.

Navig8 has zero tolerance for slavery and human trafficking and is committed to respecting the rights and dignity of all people and to operating in accordance with the UK Modern Slavery Act 2015.

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

As part of our Global Business Conduct Guidelines, Navig8's Anti-Slavery and Human Trafficking Policy details our intention to be cognisant of and identify any potential risk areas in our supply chains and to protect any whistle blowers if any such risks are found and reported. We encourage openness and will support any member of staff raising genuine concerns.

We require all staff members to have read, understood and comply with Navig8's Anti-Slavery and Human Trafficking Policy. Our zero-tolerance approach means that any breaches of this policy will result in disciplinary action.

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

Navig8 regularly reviews all of its policies to ensure their suitability and relevance to our business activities. The policy was reviewed in the 2019/2020 financial year and was communicated to all staff members.

### **RISK ASSESSMENT**

Navig8's Board and management teams consider there is minimal risk within Navig8 that there are any processes in which we could be seen to support or be complicit in slavery and human trafficking. Accordingly, the key risk areas are within Navig8's supply chain. We consider that the greatest risk of modern slavery in our supply chains is when we deal with companies based in jurisdictions which do not have equivalent standards and legislation to the UK.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Navig8 will not knowingly support any business involved in slavery or human trafficking. We expect our suppliers and contractors to take steps to not use forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Our suppliers are expected to hold their own suppliers to the same standards. We will cease to conduct further business with a counterparty that cannot demonstrate it is engaging in efforts to meet these standards.

In the 2019/2020 financial year, Navig8's legal department drafted anti-slavery and human trafficking clauses that, starting from the 2020/2021 financial year, we will look towards including in our dealings with suppliers.

## **TRAINING**

To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, training on Navig8's policy forms part of the induction process for all staff members, and further training will be provided as necessary.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Navig8's slavery and human trafficking statement for the financial year ending 31 March 2020. The directors of Navig8 Europe Ltd and Navig8 Chemicals Europe Ltd approved this statement on 4 August 2020.



Daniel Chu, Director

Date: 4 August 2020