

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31 MARCH 2021

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 314 employees worldwide and operates in 13 countries.

Navig8 Europe Ltd and Navig8 Chemicals Europe Ltd (each of them, or together, as applicable, "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 – SUPPLY CHAINS

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.

COUNTERPARTY 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.

NAVIG8 COUNTERPARTY CODE

In the 2020/2021 financial year, Navig8's legal department drafted 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 UK Modern Slavery Act 2015 and adhere to these standards and values as set out in the Navig8 Counterparty Code.

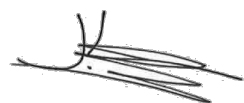
The Navig8 Counterparty Code includes, amongst other things, a commitment by Navig8 Counterparties that they shall conduct their activities in compliance with the UK Modern Slavery Act 2015 and the UN Universal Declaration of Human Rights, including without limitation refusing the use of forced, compulsory 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, Navig8's Counterparties are also expected to hold their own suppliers, employees and counterparties to the same standards.

We will look towards having the Navig8 Counterparty Code signed by Navig8's Counterparties as part of Navig8's onboarding process. Navig8 has already reached out to existing suppliers and has asked 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 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 2021. The directors of Navig8 Europe Ltd and Navig8 Chemicals Europe Ltd approved this statement on 30 September 2021.



Jonathan Keats, Director

Date: 30 September 2021