



WHISTLEBLOWING REGULATION

THE NAVIGATOR COMPANY

1.º

(Object)

1.1 This Regulation provides the framework and regulates the reporting by certain whistleblowers who have a relationship with The Navigator Company, S.A. (Company) or with its subsidiaries (hereinafter jointly referred to as "The Navigator Company") of irregularities allegedly occurred within this Group.

1.2 For the purposes of these Regulations, irregularities are deemed to be all situations which any interested party detects, becomes aware of or has reasonable grounds for believing to be in breach of

a) the Code of Ethics and Conduct and other Codes, Policies, Regulations and other internal rules of The Navigator Company;

b) external legislation or regulations to which The Navigator Company is subject, particularly in the following areas:

- a. Prevention of corruption and related infractions;
- b. Prevention of money laundering and terrorist financing;
- c. Protection of the environment and public health;
- d. Consumer protection;
- e. Protection of privacy and personal data;
- f. Public procurement.

2.º

(Specific Scope)

2.1. This Regulation establishes the rules applicable to the mechanisms and procedures for receiving, retaining, and processing whistleblowers ("covered matters"), as well as the rules for the protection of whistleblowers.

2.2 Within the scope of these regulations and the law, whistleblowers ("Whistleblowers") are deemed to be those who report an irregularity of which they become aware in the context of their professional activity and/or relationship with The Navigator Company, in good faith and with serious grounds for believing that the information reported constitutes an irregularity, namely

- a) The Navigator Company's employees and collaborators;
- b) Service providers, contractors, subcontractors, and suppliers, as well as any persons acting under their supervision and direction
- c) Shareholders and persons belonging to the administration or management bodies



or to supervisory or fiscal bodies, including non-executive members;

d) Volunteers and interns paid or unpaid.

2.3 Complaints submitted that exceed the scope of the matters covered will not be processed.

3.º

(Mode of reporting)

3.1 Underlying these Regulations is a system of voluntary reporting of irregularities, whose system for receiving, processing, and dealing with complaints operates through channels dedicated to this purpose and addressed to the Service Provider, namely through the following channels:

- Internet: <https://eu.deloitte-halo.com/whistleblower/website/navigator>
- Telephone: 21 04 27 839 (working days, from 9am to 6pm)
- Face-to-face: scheduling a face-to-face meeting through the phone number above

3.2 The communication is made through the whistle blowing channel made available by an external entity independent from Navigator, which will receive it.

3.3 The report may contain the identification of the author and his contact or be made anonymously. Nevertheless, and given that confidentiality is always ensured, the identification of the whistleblower is recommended, as this will speed up the investigation process, facilitating contact.

3.4 The whistleblower has the right to rectify his/her complaint, as well as to change it on the basis of supervening facts. This right should be exercised through the same means previously used for communication.

3.5 Considering the existence of an internal reporting channel, the whistleblower may not previously resort to external reporting channels or publicly disclose the irregularity, except in the cases provided for in article 7 of Law no. 93/2021, of 20 December.

3.6. The whistleblower who, outside the cases provided for by law, reports an infringement to a media organization or journalist does not benefit from the protection afforded by law.

3.7 In the context of internal denunciation, the whistleblower will be notified in accordance with the following deadlines

(a) Within 7 days from the date of receipt of the complaint, on the receipt of the complaint and on the requirements, competent authorities and manner of admissibility of the external complaint, if applicable;

(b) Within 3 months from the date of receipt of the complaint, on the measures planned or taken to act on the complaint and the reasons therefor; and



(c) If the complainant so requests, within 15 days from the date the analysis is concluded, on its result.

3.8. Under the terms of Article 4, The Navigator Company reserves the right to refuse to deal with complaints whose contents exceed the scope of the matters covered by these Regulations or which do not contain a description of the facts supporting the alleged irregularity, selecting only those which provide sufficient grounds for an investigation, and which are related to the subject matter of these Regulations, excluding impertinent complaints

4.º

(Handling of complaints)

4.1. The receipt of a complaint shall always give rise to an investigation procedure unless it is manifestly unfounded.

4.2. The complaint is received by the Service Provider and referred to the Whistleblowing Committee (CDI), which is composed of the Director of Legal, Compliance and Public Affairs (DLC), the Director of Risk Management (DGR) and the Compliance Officer.

4.3 In cases where the complaint may relate to any member of the Committee referred to in the previous paragraph, it is referred to the Supervisory Board.

4.4. The person responsible for following up the complaint shall

- a) Determine whether the complaint contains the minimum grounds for triggering an inquiry procedure. In cases where it is not necessary to proceed with such a process, this decision must be validated by the President of the Executive Committee, or, if it concerns the Executive Committee, by the Fiscal Council, and be filed with the process.
- b) Determine the involvement of other bodies, directorates or employees, whose interest is related to the inquiry process or that may contribute to it.

4.5 Under the terms defined by these Regulations, reports of irregularities are treated as confidential information by all those involved in the investigation process, including those responsible for the operational management of the mechanisms and procedures for receipt, retention and treatment.

4.6. The team set up for the inquiry process shall promote the implementation of appropriate measures to protect the information and data contained in the complaints and respective records, as well as promote the actions necessary for initial confirmation that there are sufficient grounds for conducting an inquiry.

4.7. The Audit Committee and, whenever they involve a member of the Board of Directors or the Audit Committee, the Ethics Committee, shall be informed of all reports received.



- 4.8 All persons who have a conflicting interest in the situation that is the subject of the report shall be excluded from the investigation and decision-making process, in order to ensure that the receipt, screening, analysis and filing of the report are handled in an independent, autonomous and impartial manner.

5.º

(Fact-finding process)

- 5.1. The process of investigation shall verify all the facts necessary for assessment of the alleged irregularity, and the body responsible for this process may be assisted in this process by other bodies, departments, or employees of The Navigator Company, whenever this is deemed necessary, or even by external auditors or other experts hired to assist in the investigation.
- 5.2 The investigation process ends with the closure of the case or with a proposal to apply the measures appropriate to the irregularity in question. At the conclusion of the inquiry process a report will be produced containing the conclusions and:
- a) measures required to correct the irregularity and, if applicable, the respective disciplinary sanction;
 - b) indication as to whether any measures have not been taken, with the reasons for non-implementation duly substantiated;
 - c) communication to external entities, whenever justified.
- 5.3 The proposal for action and the report referred to in the previous number shall be addressed
- a) to the Executive Committee and the Fiscal Council; or
 - b) to the Board of Directors and the Fiscal Council, when the object of the complaint exceeds the scope of the powers delegated to the Executive Committee.
- 5.4 The Audit Committee, the Whistleblowing Committee and the Board of Directors shall receive a copy of the decision to act, except when it is the body itself that takes the decision.

6.º

(Confidentiality)

- 6.1. Whistleblowing will always be treated as confidential information, under the terms defined in these Regulations.
- 6.2 Confidentiality shall cover, namely, the identity of the Whistleblower, the facts reported and also the identity of any third parties mentioned in the report.
- 6.3 Because of its confidentiality, all those who have access to the information



contained in the investigation processes of alleged irregularities will be obliged to keep it confidential.

7.º

(Non-retaliation)

- 7.1. The report of an irregularity must not imply, in any way, any prejudicial treatment, retaliation, harassment, subpoena or discrimination of the Whistleblower by The Navigator Company or other employees, and The Navigator Company shall ensure that no such treatment occurs.
- 7.2 Non-retaliation shall extend to the persons referred to in article 6.4 of Law 93/2021 of December 20.
- 7.3 All reports must be made in good faith and with reasonable grounds.
- 7.4 Failure to comply with the provisions of the previous paragraph may result in the opening of disciplinary proceedings or the application of a sanction against the whistleblower, depending on whether the whistleblower is an employee or supplier/service provider.

8.º

(Data Protection and Retention)

- 8.1. The information communicated under this Regulation shall be used exclusively for the purposes provided for therein, with the following bases of lawfulness:
 - (a) Compliance with legal obligations imposed on The Navigator Company, namely regarding the mandatory implementation of a whistleblowing channel, under the terms established in Law no. 93/2021, of December 20;
 - b) Pursuit of the legitimate interests of The Navigator Company, namely knowledge and prevention of irregularities occurring within the Company;
 - c) Consent from the author of the communication who chooses to identify himself/herself to the whistleblowing channel.
- 8.2 The security of the information supplied regarding alleged irregularities and the respective records is ensured by internal rules of The Navigator Company, in compliance with the applicable legislation on data protection and information security.
- 8.3 The author of the communication and the person identified in it are assured the right to access the personal data concerning them and to obtain their rectification or suppression if they are inaccurate, incomplete or equivocal.
- 8.4 In the case of the person identified in the communication, the provisions of the previous paragraph will not apply if and to the extent that the exercise of these



rights may conflict with other rights that should prevail, and information about the author of the communication may never be provided.

- 8.5 The right to access, rectify and delete data concerning him/her under the terms of this article shall be done by means of a written statement addressed to DPO_NVG@thenavigatorcompany.com, except in the case where data processing is for the purpose of ascertaining the veracity of a suspicion of the commission of criminal offences, in which case the right of access by the reported party shall be exercised through the National Data Protection Commission (CNPD).
- 8.6 Under the terms of the personal data protection regulations, the holders of personal data subject to processing have the right to lodge complaints with the CNPD regarding the processing of personal data concerning them.
- 8.7 The personal data mentioned in the communications and in the investigation processes and subsequent conclusions will be kept in a way that allows their complete reproduction within the period of time necessary to comply with legal obligations, after which they may be anonymized.
- 8.8 The Navigator Company keeps a record of the complaints received and will keep it for at least five years or, regardless of such period, during the pendency of legal or administrative proceedings regarding the complaint. However, all personal data that is clearly not relevant for the processing of the complaint shall not be kept.

9.º

(Dissemination and monitoring)

- 9.1. The Board of Directors shall promote the dissemination of these Regulations among those to whom they are addressed, and in particular, within The Navigator Company, by its current employees, and shall ensure that all those who may work with the Group in the future are aware of them.
- 9.2 The whistleblowing channel shall be disclosed on The Navigator Company's internet and intranet sites.

10.º

(Entry into Force)

These Regulations shall come into force immediately.

[Lisbon, 16 May, 2022]

The Board of Directors