

Navigator Gas Ethics Portal

FAQ

Document Version	1.1
Title	Navigator Gas Ethics Portal FAQ
Date	16/01/2026

About EthicsPoint/Portal

What is the Navigator Gas Ethics Portal?

The Navigator Gas Ethics Portal is an anonymous reporting tool that enables reporting of misconduct, including suspected violations of Navigator Gas' Code of Conduct and Business Ethics.

The Portal is provided by NAVEX, a third-party vendor, through its EthicsPoint confidential reporting system.

Why do we need a system like EthicsPoint?

Our people and partners, including employees, vendors, customers, and other stakeholders, are our most important asset. By creating open channels of communication, we promote a positive work environment and maximise productivity.

An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Can anyone use the Portal?

The Navigator Gas Ethics Portal is intended for use by current and former employees of Navigator, as well as contractors, consultants and interns. However, it may also be used by any of our business partners to report any business-related concern about our organisation.

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to submit a confidential, anonymous report either online through the Portal or by telephone with the assistance of a NAVEX call centre representative.

Isn't this system just an example of someone watching over me?

No. EthicsPoint is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace, and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting – General

Do I have to make a report via the Navigator Gas Ethics Portal?

No. You may also make a report to your line manager, a member of the Executive Committee, the Head of Legal or the Head of People & Culture. You may also make a report to the ethics committee by email at ethics@navigatorgas.com.

What types of issues can be reported using the Navigator Gas Ethics Portal?

The Portal is intended for reporting suspected violations of Navigator Gas' Code of Conduct and Business Ethics, or any related laws or regulations. Such suspected violations may include concerns regarding bribery, facilitation of tax evasion, theft, fraud or other criminal activity, accounting irregularities, theft, human rights, modern slavery, harassment or threats, conflicts of interest, health and safety risks, damage to the environment and any breach of legal or



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professional obligations.

If I see a violation, shouldn't I just report it to my manager, security, or people & culture and let them deal with it?

When you observe behaviour that you believe may violate the Navigator Gas' Code of Conduct and Business Ethics related laws or regulations, we expect you to report it. The Navigator Gas Ethics Portal is not intended to replace the reporting of routine concerns to your manager, the Head of People & Culture, or the Ethics Committee. Matters such as administrative issues, general employment issues and conflicts or disagreements between staff members should be referred to and resolved by your line manager or Navigator's People & Culture department, in line with our grievance procedures.

We recognise, however, that there may be circumstances in which you are not comfortable reporting an issue through these channels. For those situations, we have partnered with NAVEX to provide a confidential reporting Portal. We would rather you report concerns (anonymously if preferred) than keep important information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment, and with that right comes the responsibility to act ethically and to let the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence of an entire company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

What happens once I make a report? Where do these reports go? Who can access them?

Once your report has been submitted, it is uploaded directly to the EthicsPoint secure server. NAVEX makes these reports available only to designated members of the Company's Legal and Compliance team. Each of these report recipients has received training on keeping these reports in the strictest confidence. The appropriate legal/compliance team member will carry out an initial review to determine whether and to what extent an investigation is required. Depending on the seriousness of the situation, the legal and compliance team member may appoint external advisors to assist with the investigation.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to a computer or are uncomfortable using one, you can call the EthicsPoint toll-free hotline, available 24 hours a day, 365 days a year.

Will I face retaliation if I make a report?

No.

We encourage openness and will support any individual who raises a genuine concern, even if it



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turns out to be mistaken. Navigator is committed to protecting the rights of any individual making a report, and we will not engage in or condone any reprisal or retaliatory action against any person making a report in good faith.

Navigator does, however, reserve the right to discontinue any investigation and take appropriate disciplinary action in accordance with applicable law if we conclude that a reporting party has made false allegations maliciously.

What protection is in place for someone implicated in a report?

Navigator is committed to ensuring that the process for reviewing the validity of an allegation made against any person is confidential, fair, and impartial. Except where it would be unreasonable or unlawful to do so, we will give any person accused of misconduct the opportunity to respond to any such allegation.

Where required by applicable law, Navigator will inform a person implicated in any report that they are the subject of an investigation. The notification of such information may, however, need to be deferred or limited to safeguard the integrity of the investigation.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

Reporting Security and Confidentiality

If I choose to make a report anonymously, what safeguards are in place to protect my anonymity?

The Navigator Gas Ethics Portal allows a reporting person to remain anonymous. If you choose to report on an anonymous basis, Navigator Gas and NAVEX will take no action to identify you. All communication between Navigator's legal and compliance team and you will be carried out through the NAVEX online messaging system, which is anonymous.

Throughout its investigation, Navigator will take steps to ensure the confidentiality of any report and related investigation. Details of your report will only be disclosed to the extent strictly necessary to carry out any investigation. Navigator will use all reasonable endeavours to ensure that the privacy interests of any implicated person/people are also safeguarded.

If you report anonymously, you should be aware that an adequate investigation may be more difficult if we cannot obtain further information from you. It is also more difficult to establish whether any allegations made are credible.

Please note that the details of a report and the person's identity (unless made anonymously) may need to be disclosed to relevant external regulatory authorities if Navigator is required to comply with applicable laws and regulations, or where Navigator has to obtain legal advice.

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX data shows



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that fewer than 12% of reports are generated during business hours.

I am concerned that the information I provide to EthicsPoint will ultimately reveal my identity. How can you assure me that it will not happen?

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years in the company...".

Is the telephone toll-free hotline confidential and anonymous, too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report, and an interviewer will type your responses into the EthicsPoint website. These reports are protected by the same security and confidentiality measures during delivery.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

Our company promotes ethical behaviour. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report them.

I am not sure if what I have observed or heard is a violation of company policy or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions about my report?

When you file a report at the EthicsPoint website or through the EthicsPoint Call Centre, you receive a unique, randomised number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system either online or by phone to access the original report and add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site within the specified time to answer the company's questions. You and the company have now entered into an "anonymous dialogue," where situations are not only identified but also resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.



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What if I lose my Report Key or forget the Password I created?

To ensure security and confidentiality, if you lose your report key or password, you will need to file a new report. Mention in the latest report that it is related to a report or question you previously submitted.

Can I file a report from home and remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away Internet addresses, ensuring total anonymity.

