

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31 MARCH 2022

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 of Navig8 Topco Holdings Inc., a corporation organised and existing under the laws of the Republic of the Marshall Islands, on behalf of itself, Navig8 Europe Ltd, Navig8 Chemicals Europe Ltd, Integr8 Fuels Europe Limited, and all other relevant affiliated entities to whom the provisions of the Act applies (each of them or together, as applicable, “Navig8” or the “Group”).

Navig8 is a fully integrated provider of shipping management, bunker trading and brokerage services and the world’s largest independent pool and commercial management company. As an experienced ship owner and operator, Navig8 is also an active charterer, enabling the Group to offer employment optionality to owners. As at the date of this statement the Group has 350 employees worldwide and operates in 12 offices across 10 countries.

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

- acting ethically and with integrity in its business relationships, and
- implementing and enforcing effective systems and processes,

to ensure modern slavery or human trafficking is not taking place anywhere in its own business or in any of its 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 its Global Business Conduct Guidelines, Navig8’s Anti-Slavery and Human Trafficking Policy details its commitment to identifying any potential risk areas in its supply chains and to protect any whistle blowers if any such risks are found and reported. Navig8 encourages openness and will support any member of staff raising genuine concerns.

Navig8 requires all staff members to have read, understood and comply with Navig8’s 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.

One of Navig8’s 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 all of its policies to ensure their suitability and relevance to its business activities. Such policies are regularly communicated 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’s wider supply chain. The greatest risk of modern slavery in Navig8’s supply chains is when dealing with companies based in jurisdictions which do not have equivalent standards and legislation to the UK.

COUNTERPARTY ADHERENCE TO NAVIG8 VALUES AND ETHICS

Navig8 will not knowingly support any business involved in slavery or human trafficking. Navig8 requires its suppliers and contractors to stringently avoid use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Suppliers are expected to hold their own suppliers to the same standards. 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 UK Modern Slavery Act 2015 and adhere to these standards and values as set out in the Navig8 Counterparty Code.

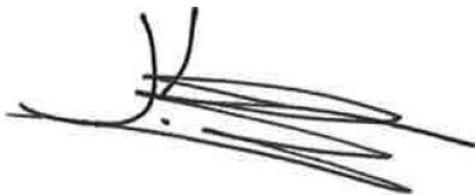
The Navig8 Counterparty Code includes, amongst other things, a commitment by Counterparties that they shall conduct their activities in compliance with the UK Modern Slavery Act 2015 and the UN Universal Declaration of Human Rights, including without limitation refusing the use of forced, compulsory 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, 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 process for prospective new Counterparties. 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 its supply chains and business, training on Navig8's modern slavery policy forms part of the induction process for all staff members, and further training is provided as necessary on an ongoing basis.

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 March 2022. The directors of Navig8 Topco Holdings Inc. approved this statement on the date set out below.



Jonathan Keats, Director

Date: 14 September 2022