navarino

Modern Slavery & Human Trafficking Statement of Policy for the Financial Year 1 Jan – 31 Dec 2023

Version 6th/2023

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1. Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year from 1 January 2023 to 31 December, 2023.

Navarino Group acknowledge that Modern Slavery can take many forms including slavery, forced labour, servitude and human trafficking, which all constitute an affliction on modern society, which must eagerly and actively be fought.

”Slavery” occurs when a person is owned as property with the exercise of powers of ownership over them, ”Servitude” refers to the obligation to provide services for no reward imposed by coercion, with the person not free to leave and “Forced or Compulsory Labour” entails work or service extracted from any person who is forced to do work that he/she has not agreed to, under the threat of punishment. Freedom is taken away by threats, violence, coercion, abuse of power and deception.

Human trafficking occurs when a person facilitates the travel of another person with a view to that person being exploited.

Both modern slavery and human trafficking are criminal acts.

The statement sets down Navarino (UK) Limited Group’s commitment to preventing slavery and human trafficking in its business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

2. Policy Statement

Embracing the moral principles stated in the Universal Declaration of Human Rights and the EU Charter of Fundamentals Rights, Navarino Group adopt this Anti-Slavery and Human Trafficking Policy, which applies to all persons working for and/or on behalf of all subsidiaries of Navarino Group, including employees at all levels, directors, officers, interns, agency workers, agents, contractors, suppliers, and resellers.

Navarino Group undertake the responsibility to be alert in its business and in the wider supply chain to the risks of these blights by,

- prohibiting the use of modern slavery and human trafficking in its operations,
- committing to ensure that modern slavery and human trafficking will not take place anywhere within the organisation or in any part of its supply chain,
- encouraging employees to, anonymously, report concerns about business partners’, managers’, and other employees’ actions of human rights violation.

This is the Statement of Navarino (UK) Limited in accordance to section 54 of the UK Modern Slavery Act 2015 to be published. Throughout this statement, references to the “Company” or “we” include references to Navarino (UK) Limited Group and all other corporate entities within its global group.

3. Our Structure

Navarino (UK) Ltd Group include the following corporate entities (subsidiaries) carrying on business in Greece, Cyprus, Germany, Norway, Hong Kong, Singapore, and U.S.A.

- Navarino Single Member S.A – Greece
- Navarino Norway (AS)
- Navarino Germany GmbH
- Navarino (Hong Kong) Ltd
- Navarino (Singapore) Pte Ltd
- Navarino Technology CY Ltd, Cyprus
- Navarino USA

4. Our Business

Navarino (UK) Ltd Group is a satellite communications/connectivity provider and developer of advanced technologies and innovative IT solutions. We are addressing the Maritime industry, meeting merchant vessels' connectivity needs and IT requirements, worldwide.

Our business runs its activities during the standard working hours dictated by the respective Labour legislation of the countries in which we operate.

5. Our Supply Chain

The majority of Navarino (UK) Ltd Group Suppliers are large, well known international companies providing satellite communication services, satellite and maritime hardware equipment, web hosting services, technical services relating to the connectivity, IT Solutions and networks onboard merchant vessels. Navarino Group's 30 largest suppliers (out a total of 403) account for approximately 80% of the procurement spending and are international organizations located in the UK, Germany, Denmark, USA, the Netherlands, Canada, Norway and Greece.

The remaining 20% of Navarino (UK) Ltd Group's procurement spending is related to local suppliers for products and/or services that are not considered to be of risk for human trafficking or slavery (such as property owners, computer & computer spare parts procurement, service engineers, consultants, logistics, etc).

6. Policies and Practices

6.1 Corporate Values and Policies

Within the Navarino (UK) Ltd Group Corporate Values https://navarino.co.uk/about-us/ we set out the principles to which all employees are expected to adhere and suppliers to advocate in meeting these standards.

Additionally, Navarino (UK) Ltd Group operates a series of policies to mitigate the risk of modern slavery and outlines the measures taken to prevent slavery and human trafficking in its operations and supply chain.

These include Navarino People Handbook (Code of Conduct), Recruitment Policy, Performance Management Policy, and Navarino Competence Library, Health and Safety Policy, Human Rights and Whistleblowing Policy, Anti-Harassment Policy, Anti-Bribery, Anti-Corruption and Anti-Money laundering Policy along with the respective reporting lines, where applicable.

These policies are accessible to all Navarino (UK) Ltd Group stakeholders on our website https://navarino.co.uk/esg/ and are being regularly reviewed and updated when it is required.

6.2 Due Diligence

Navarino (UK) Ltd Group initiatives to identify and mitigate risks currently include:

- We are building long standing relationships with our major suppliers being large, solid international companies with defined and published Anti-Slavery and Human Trafficking Statements and Policies. We maintain a Supplier List with the respective URLs.
- No goods or services considered to be of higher risk for human trafficking or slavery (e.g. agriculture, textiles, construction, entertainment, etc) are procured by Navarino Group.
- Having in place contractual terms that ensure the parties (e.g. suppliers, contractors, resellers, customers) conform to local, European and international laws, while provisioning goods and services in the supply chain.
- Navarino Group Contracts with suppliers indicate that any rights or obligations cannot be sub-contracted to any third party without the written consent of the contracting parties.
- We ensure transparency in our financial and tax related activities by running yearly audits.
- Our legal compliance is consistently related to Employment, Occupational Health and Safety & Wellbeing regulations.
- Our recruitment process is transparent. We perform vetting of new employees that ensure they can confirm their identities and qualifications and they consent to be paid directly into an appropriate, personal bank account.
- We have adopted a Whistleblowing Policy that will ensure any person part of our Company and/or our Supply Chain feel free to raise concerns about potential unlawful acts or practices violating the human rights, without fear of reprisals. Our Whistleblowing Policy can be found at https://navarino.co.uk/wp-content/uploads/2023/12/Whistleblowing-Policy.pdf. The effectiveness of the

Whistleblowing Policy will be measured by a) the number of incoming reports and b) the number of the investigated incidents that will be classified as modern slavery and human trafficking practices.
No incidents were reported during 2023.

- We encourage external stakeholders to report anonymously at whistleblowing@navarino.gr any concerns about noticed incidents of violation of human rights within the supply chain.
No incidents were reported during 2023.
- We encourage our employees to report any concerns about business partners', managers' and other employees' actions of human rights violation, illegal and unethical behaviors.
No concerns nor incidents were reported during 2023.
- A Committee consisting of Navarino Group Senior Managers is formed for assessing and handling Reports and proposing measures it deems necessary and appropriate. The Committee consists of the Whistleblowing Reports Receiving and Monitoring Officer ("WRRMO") acting as President, the Chief People Officer acting as secretary and the Legal Counsel of the Navarino Group, acting as member.
- Regular internal trainings occur with informative material on the definition of modern slavery, the basic principles of the Modern Slavery Act 2015, on occupations, environments, sectors of high risk, on how to identify suspected incidents of modern slavery and human trafficking, how to report incidents of modern slavery and human trafficking within the Company, how to escalate potential slavery and human trafficking issues to relevant parties, and how to support potential victims.
- A Health & Safety Committee was formed in 2021 to regulate H&S issues: identify, evaluate and control hazards, draft and review Safety Policies, plan and organize H&S trainings and drills. On 2023 Navarino Single Member SA was certified according to ISO 45001 Standard by Bureau Veritas.
- A sustainability strategy was formed in 2022 aiming to fully incorporate ESG (Environment- Social – Governance) criteria in business strategy by 2025.
- In the suppliers' evaluation policy, sustainability related criteria (E-S-G) have been added next to the existing business criteria.
- Navarino developed a due diligence supplier Policy that includes among others specific questions on modern slavery and human rights issues.

6.3 Commitments for 2024

- Continue developing training modules on Modern Slavery and Human trafficking.
- Continue monitoring and responding to changes in legislation on Modern Slavery and Human Trafficking
- Continue to evolve the antislavery and human trafficking policy seeking guidance from available best practices and experts, where possible and appropriate.

- Implement extensive screening process for at least 50% of the Navarino Group suppliers based on the due diligence supplier Policy.

7. Risk Analysis

Whilst the risk of slavery and human trafficking in the Group's activities and supply chains are low, we acknowledge that there are potentially victims of modern slavery and human trafficking living in some of the geographical areas we operate. However, our key suppliers have been reviewed and found to be in very low risk areas working in sectors that are not considered to be of high risk and with defined and established Anti-Slavery and Human Trafficking Policies in place.

8. Review & Publication

This Statement will be reviewed by the Quality Assurance and Compliance Manager annually or whenever legal, business or other reasons dictate. The QA&C Manager will demonstrate progress and suggest new targets that will be subject to the Board of Directors' approval.

Once the Statement is approved, it will be published to the Corporate website www.navarino.co.uk, on https://tiscreport.org/ and www.modernslaveryregistry.org within 6 months after 31/12/2023, being the date the financial year ended.

9. Contact

For any questions or for information on the policy outlined in this document, please contact Tom Kyriakopoulos at tk@navarino.co.uk or at +30 6944 591214.

10. Approval

This Statement was approved by the Board of Directors on 5/3/2024.

Tom Kyriakopoulos (Director)



Signature

Date 27/3/2024