THE NAVIGATOR COMPANY

ANNUAL REPORT 2025

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ANNUAL REPORT 2025

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1. Overview

1.1. Message from the Chairman of the Board of Directors

In a year marked by economic and geopolitical instability, the importance of solid companies with the capacity to invest and transform becomes even more relevant. This is what distinguishes The Navigator Company: a company that actively contributes to Portugal's and Europe's economic, social and environmental progress.

At a time when Europe is discussing its strategic autonomy, the forest-based bioeconomy must be recognised as a strategic sector. It is a sector grounded in a renewable resource that is deeply connected to the territory and local economies, strongly leveraged by continuous investment in innovation and industrial transformation, and further distinguished by its ability to create large-scale qualified employment.

The forest-based bioeconomy should be acknowledged as a differentiating industry, not only in Europe, but especially in Portugal. This strategic vertical has the potential to strengthen the national economy, ensuring global competitiveness and productivity. This industry, however, depends on one essential factor: sustainable and competitive access to raw materials. In Portugal, the scarcity of wood — the result of policies that disregard the merits of sustainable forest production — is now one of the greatest obstacles to competitiveness and to the emergence of a new bioeconomy.

Navigator has decades of experience in sustainable forest management, supported by science and technology. It is on this basis that we have built benchmark industrial assets and advanced R&D capabilities, developing biomaterials, biochemicals and other bioproducts. With an adequate raw-material base, opportunities can be seized to generate value for the country — in human, industrial, technological and environmental terms — in a field that has already demonstrated unique conditions for global resilience.

The year 2025 showed that even in challenging times it is possible to maintain a clear vision and move forward with determination. Despite the adverse environment, Navigator continued on its path of investment, diversification and sustainable transformation, investing more than 200 million euros, 61% of which in environmental projects and initiatives to improve operational efficiency. Environmental impact and profitability are pillars that reinforce each other — and this is what ensures a solid business model that remains resilient regardless of economic cycles.

Thus, over the past year, Navigator succeeded in maintaining a trajectory consistent with its long-term plan, ensuring continuity in its strategic priorities. The Company continued its programme of modernisation, investment and sustainable transformation, confirming the solidity of its business model.

The integration of advanced technological solutions and the strengthening of energy autonomy are part of a future-oriented project anchored in clear priorities. This effort confirms a strategy based on structural choices that do not depend on economic cycles.

People are at the heart of this transformation. At a time when the Company is transforming, diversifying its portfolio, and investing in innovative products, digitalisation and industrial modernisation, it is people who embody the success of this journey. In 2025, we continued to invest in the development and enhancement of talent, mobilising teams for projects such as CRESCER, strengthening critical skills and achieving our best-ever safety performance — a reflection of the maturity of our teams and the culture we have built.

This approach is fully aligned with the commitments the Company has assumed regarding responsible conduct. Navigator is a signatory to the United Nations Global Compact, embedding these principles in its codes of conduct, internal policies and governance model.

We are a bioindustry on the right side of the future: we transform renewable resources into innovation and place people and the planet at the centre of decision-making.

It is this combination — purpose, people, industry and innovation — that defines Navigator today and will continue to guide our contribution to Portugal and to Europe in the coming years.

Ricardo Pires
Chairman of the Board of Directors

1.2. Message from the Chief Executive Officer

The year 2025 proved to be a real stress test for companies across virtually every region of the world, putting the resilience of organisations—and, above all, the robustness of their long-term strategies—to the test. In this challenging context, Navigator's response highlighted the merits of a growth strategy that has been implemented based on the pillars of product diversification, industrial efficiency, decarbonisation and digital transformation.

The evolution of the portfolio now constitutes a concrete pillar of this robust business model, with a direct impact on the sales mix, and the Tissue segment illustrates this trajectory well. Driven by acquisitions and organic growth, it has grown from 5% to around a quarter of turnover in less than ten years, a development firmly anchored in the company's own research and development capabilities. In parallel, sustainable packaging solutions, also designed and manufactured entirely on the basis of in-house knowledge, technology and R&D, now account for over 4% of sales, a significant milestone in a range that is still growing.

This shift has enabled a reduction in the relative share of UWF (Uncoated Woodfree, uncoated papers for printing and writing), which accounted for around 75% in 2017 and stood at around 57% in 2025, not due to a significant decline in its turnover, but because of the growing contribution of the new segments. The resilience of The Navigator Company's UWF paper remains, in fact, one of its most striking features, a fact closely linked to the competitiveness of our assets, alongside a strategy of distinctive own-brand products recognised in over 117 export destinations worldwide. Navigator's brands currently account for 66% of sales, compared with an estimated industry average of between 20 and 25%, with its global leadership in the Premium segment being particularly noteworthy. Indeed, in 2025, Navigator increased its market share by 1.5 percentage points to around 26%, a development driven by performance in international markets (+5 pp), alongside growth of 0.5 pp in Europe, where the share reached 19%.

Navigator's strategic development reflects an integrated approach to long-term value creation, in which sustainability is viewed through a "pragmatic lens", that is, recognising its full potential as a driver of competitiveness. The company integrates environmental, social and governance criteria into its decisions, ensuring its strategy is aligned with the United Nations Sustainable Development Goals (SDGs), translating global priorities into measurable value for the business. Within this framework, the close integration of the industrial model, responsible resource management, innovation and operational discipline aims to combine growth with a positive impact on society and the environment, strengthen our competitive advantage and resilience, and position us in markets prepared for the future.

Decarbonisation stands out as one of the most tangible drivers of this pragmatic approach to sustainability, combining emissions reduction with industrial efficiency. The projects included in the Decarbonisation Roadmap demonstrate that the transition to low-carbon models can be both environmentally responsible and financially profitable, resulting in a structural reduction in energy costs, reduced exposure to the price of CO_2 allowances, and lower dependence on grid-purchased energy, through new renewable energy assets for self-consumption. Taking into account the operational and market assumptions of the 2026 budget, the implementation of these measures represents a cumulative economic benefit of €49.1 million compared to 2018, demonstrating the effective creation of value associated with sustainable options.

These projects highlight the convergence between sustainability and innovation, through the introduction of technologies that enable the replacement of fossil fuels with sustainable biomass, the valorisation of by-products from the production process, and the improvement of operational efficiency. The conversion of lime kilns to biomass at the industrial complexes in Setúbal, Aveiro and Figueira da Foz, supported by European instruments such as the Innovation Fund and the PRR, is a concrete example of this approach, combining a significant reduction in GHG emissions, enhanced circularity in resource use and an improvement in the cost base of the industrial process.

Over the years, Navigator has established a culture of operational excellence, innovation and sustainability, but past success is no guarantee of the future. The industrial sector is being reshaped by new technologies, more demanding customers and global

competitors, requiring agility, efficiency and the ability to adapt. We are therefore accelerating our digital transformation, integrating automation, AI and new digital platforms across the board.

In industrial operations, the implementation of Advanced Control solutions incorporating AI models has enabled a reduction in process variability of around 20% and generated significant environmental and economic gains, such as the 5% reduction in chemical consumption in pulp bleaching. These solutions extend to other areas of the business, such as Logistics, with the Extranet Transportation Logistics Portal delivering productivity gains of 20%, or the Navigator Commercial HUB, which has reduced manual order processing by 22%.

The integration of AI and automation enables us to reinvent processes, free up talent for higher-value tasks and accelerate innovation. Our people are at the heart of the digital acceleration process, which is why we have been continuously investing in their development through training programmes and participation in digitalisation projects. We have also been focusing on developing new technological solutions through prototyping (more than 40 products by 2026), strengthening partnerships with universities and start-ups, and implementing upskilling and reskilling programmes in AI.

Non-conformity is, perhaps, one of the most prominent hallmarks of Navigator's DNA. A company that has never limited itself to managing cycles, but has always sought to anticipate new structural realities. This has been the case ever since, seven decades ago, the company became the first in the world to industrialise bleached eucalyptus pulp using the kraft method – now the international benchmark – on a journey strongly marked by R&D and the ability to bring it to fruition.

Innovation remains a cornerstone today, clearly reflected in diversification and, specifically, in the evolution of the Packaging business, alongside R&D into future forest-based bioproducts in the fields of biomaterials, biochemicals, biofuels and e-fuels.

The expansion of the gKRAFT range and moulded pulp solutions reflects a commitment to renewable alternatives for packaging, underpinned by a disciplined capital approach based on the adaptation of existing assets and the preservation of industrial flexibility. Despite the European context marked by advances and setbacks in the effective implementation of restrictions on single-use fossil-based plastics, the company maintained its investment in sustainable packaging in 2025, anticipating regulatory and market demands and reinforcing its positioning as a bio-industry focused on renewable solutions.

This same logic of growth through diversification and the enhancement of fibre value also extends to more established businesses, notably Tissue. In this context, as early as 2026, the decision was taken to invest in a new machine at the Aveiro industrial complex. Budgeted at €115 million, this investment boosts production capacity and is scheduled to come on stream in March 2028.

I mentioned "non-conformity" as an element of Navigator's identity because it is, first and foremost, a human attribute, rather than one of technology, assets or processes. It was this attitude, expressed through high standards, responsibility and a refusal to stand still, that enabled the company to navigate a challenging year and stay on its strategic course.

It is this quality, present in the people who build Navigator every day, that explains the company's long-standing ability to innovate, anticipate change, execute with rigour and continue to create value in a future marked by rapid transformation.

This is the hallmark of Navigator.

1.3. 2025 in numbers

Financial data

€1 970 m
Total sales

€376 m
EBITDA

€145 m
Net income

€210 m
Capital expenditure

19%
EBITDA Margin

10.2%
ROCE

10.4 %
ROE

1.87 x
Interest bearing net debt/EBITDA

€175 m
Dividends

For the climate and nature: act

Climate Change

572 079
tCO_2e
(down 39% from 2020)
Scopes 1 and 2 emissions[2]

down
37%
Reduction in direct ETS CO_2 emissions[3] in relation to 2018 (baseline)

1 092
$tCO_2e/M€$[1]
GHG emissions intensity (scopes 1+2+3)

approximately
11 M tCO_2eq
Accumulated stock in our forests[4]

12.6 TWh
(down 0.1% on 2024)
Total energy consumed

78%
Energy consumed from renewable sources

3.8 MWh/t
(up 7% on 2024)
Energy intensity[5] in Portugal

1.3 TWh
(down 4% on 2024)
Electricity produced

1 GHG emissions intensity in accordance with ESRS E1.53. Includes total scopes 1, 2 (location-based) and 3 emissions

2 Total scopes 1 and 2 (location-based) emissions, in accordance with ESRS E1-644a and E1 6.44b

3 EETS- European Emissions Trading Scheme

4 Accumulated CO_2 stock in forests in Portugal and Mozambique

5 Energy intensity in accordance with GRI 302-3. Considering primary energy consumption and the total quantity of pulp, paper and tissue produced, in Portugal. Excluding primary energy from Biomass Power Plants, consumed for dedicated power generation

Sustainable Forest Management

139 314 ha
Assets under Navigator group management

84%
Wood used from woodlands with certified forest management[6]

93%
Wood suppliers with chain-of-custody certification

approximately
€11 m
Investment in fire prevention and support for fighting forest fires in Portugal

approximately
111 000 ha
100% certified assets under management, corresponding to 1.2% of the area of mainland Portugal

Biodiversity Conservation

11.9%
of the area under management classified as Conservation Interest Areas (managed for conservation purposes, and not for production)

4 647 ha
Classified as protected habitats by the Natura 2000 Network

112 ha
Areas that have undergone ecological restoration or rehabilitation

Water Management

down 8.4%
Specific water use in industrial operations in Portugal vs. 2019 (baseline for 2030 target)

20.5 m3/t
Specific water use[7] in industrial operations in Portugal
(0% vs. 2024)

Use of Resources and Circular Economy

5 877 755 t
Raw materials consumed

89%
Renewable raw materials

99.8%
Non-hazardous waste

492 797 t
(up 10% on 2024)
Waste generated

43 834 t
Waste and by-products reused in sustainable value-added applications

16%
Rate of waste disposal in industrial landfill

[6] Certified wood as proportion of all wood purchased - Domestic and international market

7 Takes into consideration volume of water withdrawal by total manufacturing output.

For society: grow

People, Talent and Human Capital Development

3 932
Direct jobs[8]

€217 m€
Employee pay and benefits

92.3%
Employees on permanent contracts

90
Average training hours per Employee

272
Young people in the Talent Attraction Programme[9]

approximately **31%**
Integration rate for vocational internships

53 658
Training hours for Interns

Health, Safety and Well-being

83%
Internal employees included under Occupational Health and Safety Management System[10]

1 404
Employees included under Occupational Health programme

2.8
Frequency index
de for work-related accidents[11]

8 Not including interns/bursary holders.

9 Includes vocational and summer internships in 2025.

10 There are various activities in the organisation, in particular Forest Management, Wood Supply and RAIZ, which do not fall under ISO 45001. However, activities in these sectors are subject to the same principles and procedures.

11 Includes figures for internal Employees and external Employees.

Community Relations

€1.4 m
Investment in the Community (In Portugal and Mozambique)

19.6 t
Paper donations, in Portugal

12 872
Participants in *Floresta do Saber* (Forest of Wisdom) project in 2025 (43 842 since 2020)

6 700
Families impacted, Mozambique

Responsible Business Conduct

more than **1 800**
Employees with training in Code of Ethics and Conduct, Whistleblowing, Internal Policies and Prevention of Corruption and Related Offences

0
Confirmed cases of corruption

4
Women on Governance Bodies (30.77%)

Innovation, Technology and R&D

€11.9 m
Investment in RDI[12]

53
Families of patents (accumulated)

Supply Chain Management

7 829
Suppliers

69%
Volume of purchasing from Portuguese suppliers

12 Navigator's total RDI expenditure on basis of amount eligible for SIFIDE

1.4. Awards

SUSTAINALYTICS

Score: **12.6**

3rd place in 71 Paper & Forestry companies with lower risk for investors (June 2025)

CDP

Score: **A**

CDP Forests ("Leadership" level)

Score: **A**

Climate Change ("Leadership" level)

MSCI

Score: **A**

In 2025, The Navigator Company achieved an A rating in the MSCI ESG Rating

ecovadis

Score: **79/100**

Top 5% companies

OTHER PUBLIC RECONGNITION

SGDs Observatory

The Navigator Company has been recognised by the SDG Observatory, a project run by the Centre for Responsible Business & Leadership at CATÓLICA-LISBON, having taken first place in the categories "Best performance in the implementation and acceleration of the SDGs" and "Good practices in SDG implementation". In the fourth annual report of this initiative, four of the Company's best practices were once again highlighted, relating in particular to SDG and ESRS reporting, products made from eucalyptus fibre, the recovery of fly ash in the industrial process, and the Navigator Forest Producers' Club.

RAIZ – Forest and Paper Research Institute

Top 10 Portuguese organisations with the highest number of international patent applications.

Reporting Matters

Navigator has maintained its position in the Reporting Matters 2025 assessment, an initiative of the WBCSD and Radley Yeldar (RY), ranking in the top five of the Basic Resources sector.

Among the strengths of the report are the detailed description of the process for determining materiality and financial impact, the acknowledgement of the challenges faced alongside the achievements, and the definition of KPIs for all material issues, with reference to data from different years and comparisons with the baseline.

Large Company of the Year Award

The Navigator Company has been awarded the Forbes "Large Company of the Year" Award as part of the "Forbes Top Growth Leaders" initiative. This event recognised the largest companies that stood out most in Portugal in 2025, based on criteria such as innovation, sustainability, social responsibility and economic and financial soundness. Navigator was named "Largest of the Year", reflecting the consistent work of its teams and its commitment to creating long-term value for the Portuguese economy.

APPM Marketing Awards

The Navigator Company has been recognised in the "Communication and Public Relations – Reports and Publications" category by APPM – the Portuguese Association of Marketing Professionals – for the design, clarity and impact of the communication in its 2024 Annual Report.

Five Stars Award

For the fourth consecutive year, the Amoos brand has been awarded the Five-Star Award, standing out in the napkin category with its 40x40 product from the Naturally Soft range, which is made from 100% virgin fibre and contains no chemical bleaches.

Consumer Choice Award

The Amoos brand has been recognised as the No. 1 Brand in the 2025 Consumer Choice Awards, in the Toilet Paper category. This award, based on the opinions and rigorous assessments of Portuguese consumers, reflects the brand's ongoing commitment to offering high-quality products that meet the everyday needs of households across the country.

Product of the Year Award

The Amoos brand has been awarded the prestigious Product of the Year seal in the Household Paper Products category. The Amoos Naturally Soft range stood out with its 3-ply toilet paper and 40x40 cm napkins, earning the highest accolade for innovation in consumer products, awarded through a direct consumer vote.

Social Responsibility Seal

Navigator Tissue Ejea has once again been awarded the distinction granted by the Aragonese Institute for Economic Development for its good, responsible and sustainable business practices and its high level of commitment to excellence. This award recognises the company for the positive impact it has on the communities in which it operates.

1.5. Parternships for impact

In 2025, Navigator strengthened the implementation of collaborative models across a range of the Company's initiatives and projects.

Partnerships and active participation in collaborative platforms with organisations that share the Company's values have helped to accelerate the achievement of our strategic objectives, amplifying the positive impact we aim to have on society, the climate and nature. The partnerships highlighted in this report represent only a fraction of the work carried out; they are examples of how Navigator values all the organisations with which it collaborates and reaffirms its commitment to joint, transparent and transformative action.

For the CLIMATE and NATURE

Collaborations with academic, educational and research institutions, associations and companies in the forestry and firefighting sectors, with the aim of contributing to the maintenance and continuous improvement of the economic, ecological and social functions of forest areas.

Partnerships with various organisations to develop innovative products and solutions that can contribute to a low-carbon economy, in line with current climate science, and a sustainable circular bioeconomy that benefits nature and is climate-neutral.

Active participation, as members, in associations of strategic importance to promote cooperation focused on sustainability, working closely with the Community.

OMYA
in Setúbal, to supply flue gas from Navigator's boilers and lime kilns, enabling the capture and incorporation of CO2 into the products manufactured at this industrial complex.

Specialty Minerals Inc.
in Figueira da Foz, to supply boiler flue gases, enabling the capture and incorporation of CO_2, and for the recovery of carbonate sludge in the products manufactured at this industrial complex.

Saint-Gobain
to promote the circular economy and decarbonisation of the mortar manufacturing industry.

BCSD Portugal
as part of the act4nature Portugal initiative, of which Navigator is a member of the Advisory Board and was one of the first companies to join.

Faculty of Sciences, University of Lisbon
as part of the logistical support for the ForCe project – Forest Certification in Eucalyptus Plantations.

Serras do Porto Park
as part of the LIFE Serras do Porto project.

Afocelca
in the context of fire response resources and mechanisms.

OFA (Atlantis Forestry Organisation)
supporting the management of small-scale forest holdings (Cantanhede and Figueira da Foz regions).

National Institute for Agricultural and Veterinary Research (INIAV)
as part of the transForm PRR project "P1.1 Genetic improvement, production and conservation of forest reproductive materials", particularly in the recovery of the Monchique oak. This project benefited from the scientific collaboration of CIBIO-Biopolis and the Botanical Garden of the University of Porto.

Wildlife Conservation Society (WCS) in Mozambique
to establish conservation and restoration priorities (multi-criteria environmental and operational analysis) in the areas where Portucel Mozambique holds land use and exploitation rights (DUAT) in the provinces of Zambezia and Manica.

For SOCIETY

Collaborations with academe, Navigator's partner companies and organisations within the scientific and technological sector, involving both national and international partners, with the aim of contributing to solutions that address society's current challenges.

Partnerships with organisations that help us promote issues ranging from environmental and forestry literacy to the importance of sport and social inclusion, as part of our commitment to social causes and the development of projects for the wider community.

Collaboration with the national public employment service, contributing to the development of human capital skills.

Vocational schools and universities
such as ATEC – Academia de Formação, Dr. Bernardino Machado Secondary School (Figueira da Foz), ISCTE – Lisbon University Institute, the University of Coimbra, the Instituto Superior Técnico and the New University of Lisbon, to participate in job fairs, award scholarships, promote workshops and seminars, and host students for work placements.

Expresso newspaper
as part of the 5th The Navigator Company/Expresso Conference, entitled "Let's discuss the forest?". The event was attended by experts and decision-makers who discussed the challenges and opportunities facing forests in Portugal. From the importance of active and sustainable management to the role of the bioeconomy in the ecological transition, the debate highlighted the need for knowledge, innovation and effective public policies.

Cenjor - Protocol Centre for Professional Training for Journalists
in organising the 2nd edition of the training course on the Portuguese forest for journalists and journalism students. The main objective of the initiative is to contribute to an informed understanding of the vital forest ecosystem and the sustainable use of its resources.

International partners
in connection with participation in the Packaging Innovations (12–13 February); Fackpack (23–25 September); Eurasia (22–25 October); PWME (11–13 November); Big Buyer (26–28 November) trade fairs.

GIMM and ABC Global Alliance
in the Pioneer Inspire Hope project supporting the fight against breast cancer, since 2005.

UN Global Compact
as part of a commitment to ethics, integrity and environmental preservation, as well as the protection of and respect for human rights, an integral part of the sustainable development promoted by Navigator, enshrined in its internal codes and policies and reflected throughout the Company's operations and strategy.

Crédito Agrícola
as part of the Navigator Forest Producers' Club, to offer exclusive preferential financing terms for members.

Galp
as part of the Navigator Forest Producers' Club, to provide discounts to its members on fuel purchases at its network of service stations.

Interprev
as part of the Navigator Forest Producers Club, to provide members with personalised services at more competitive prices.

Moeve and Oz Energia
as part of the Navigator Forest Producers Club, to benefit members with bulk fuel supplies. The partnership allows service providers, timber suppliers and hauliers to fill their tanks directly at their premises, with immediate gains in convenience and savings.

2. Our identity

2.1. Purpose and values

Purpose

It's people, their quality of life and the future of the planet that inspire and motivate us.

We want society to share not just in the wealth we create, but also in our knowledge, our experience and our resources, all in the name of a better future.

That is why we are committed to creating sustainable value for our shareholders, and for society as a whole, leaving a better planet for future generations, through natural products that are sustainable, recyclable and biodegradable, that help to sequester carbon and produce oxygen, that protect biodiversity, improve the soil and combat climate change.

Values

Trust

We believe in people, we welcome everyone's contribution, we respect their identity, promoting development, cooperation and communication.

Integrity

We are guided by principles of transparency, ethics and respect in our dealings amongst ourselves and with others.

Enterprise

We are passionate about what we do, we like to get out of our comfort zone, we have the courage to take decisions and to accept risks in a responsible way.

Excellence

In our work we focus on quality, efficiency, safety and getting it right.

Innovation

We seek to bring out everyone's skills and creative potential to do the impossible.

Sustainability

The balance between the economic, environmental and social pillars of sustainability underpins our business model.

2.2. Company profile

The Navigator Company is an integrated forest-based industrial group, active in the areas of forest management, pulp production, printing and writing paper (UWF), tissue, sustainable packaging solutions and bioenergy. Today, it is one of Europe's leading bio-industries and a global benchmark in the circular bioeconomy.

With a vertical model covering the entire valu e chain, from forest to end product, Navigator operates industrial units in Portugal, Spain and the United Kingdom and exports more than 90% of its production to 117 countries. In Portugal, the Company is the third largest exporter and the largest generator of National Added Value, as a result of its high local incorporation.

Navigator is currently the European leader and one of the world's largest producers of eucalyptus pulp and uncoated printing and writing paper (UWF), positions sustained by industrial scale, production efficiency and technological differentiation. Its installed capacity reaches around 1.6 million tonnes of pulp and 1.6 million tonnes of paper per year, with products internationally recognised for their quality. Navigator is the world leader in the premium UWF paper segment, with a portfolio strongly anchored in its own brands, which account for 66% of sales, compared to an estimated industry average of 20 to 25%, constituting one of the Company's main differentiating factors in this market.

Driven by a culture of innovation and pioneering spirit that dates back seven decades, when it became the first company in the world to industrialise the production of *Eucalyptus globulus* pulp using the kraft process, The Navigator Company has built a business model that allows it to read trends and adapt to long cycles. In recent years, this ability to anticipate has resulted in the diversification of the portfolio beyond traditional areas.

The Tissue business now accounts for around a quarter of the company's activity, the result of a combined strategy of organic growth and acquisitions. The integration of assets in Portugal, Spain and the United Kingdom positions Navigator as one of the leading operators in the European market, supported by a portfolio of products with patented technologies, focused on functional performance, efficient use of resources and continuous development of the range.

In Packaging, Navigator has developed, based on its own R&D, an innovative line of solutions based on *Eucalyptus globulus* fibres, aimed at accelerating the replacement of fossil-based plastics with natural, sustainable, recyclable and biodegradable alternatives. The range is present in various packaging segments and continues to grow. At the end of 2024, the first integrated industrial line for moulded eucalyptus pulp came into operation, with an annual capacity of around 100 million units, making it one of the largest facilities of its kind in Europe and the first in the world to be fully integrated with virgin *Eucalyptus globulus* fibres.

The forest is the starting point and a key strategic asset. Navigator manages around 110,000 hectares of forest in Portugal, corresponding to approximately 1.2% of the mainland, 100% certified by the FSC® and PEFC systems. Around 12% of this area is dedicated to conservation, including more than 4,400 hectares classified as Natura 2000 habitats. The forests managed by Navigator maintain an estimated carbon stock of around 6.4 million tonnes of CO_2, excluding carbon in the soil, reflecting a sustainable management model throughout the entire production cycle.

Navigator's development model is based on a large-scale human and territorial foundation, which in Portugal alone involves more than 30,000 direct, indirect and induced jobs, around 8,000 suppliers and a presence in 164 municipalities, linking forest producers, industry and scientific research throughout the value chain.

In Mozambique, Navigator is developing a forestry and industrial project based on favourable soil and climate conditions, in an area with a planting potential of up to 246,000 hectares. It is structured so that, in the first phase, it will market timber to international and domestic markets and, in the second phase, it will move into the paper pulp industry. It has already exported 285,000 m3 of roundwood and sold around 200,000 m3 of roundwood to local laminate production industries. This project contributes to the creation of a forestry cluster in Mozambique, with impacts on boosting the local economy; the creation of, on

average, more than 1,000 direct jobs; investment in communities of €8.5 million, covering more than 6,700 families; and environmental protection programmes.

Eucalyptus globulus, the basis of Navigator's industrial chain, constitutes a scientific and industrial competitive advantage, offering high levels of productivity, greater efficiency in the use of wood and chemicals, and a carbon sequestration capacity per hectare that is superior to that of other forest species used in the paper industry.

Through its R&D laboratory, RAIZ – Forest and Paper Research Institute, Navigator develops its own applied research, from forest to industry, but also, with an eye to the future, in biomaterials, biochemicals, biofuels and e-fuels, with dozens of registered patents and multiple proofs of concept at different levels of technological maturity. This scientific capacity underpins the diversification of the portfolio and positions Navigator as a relevant player in addressing major global societal challenges.

Sustainability is integrated into business management and capital allocation. Since 2019, Navigator has been implementing a Decarbonisation Roadmap with the aim of reducing direct CO_2 emissions by 86% by 2035, ahead of national and European targets. By 2025, emissions had already been reduced by around XX%, supported by a cumulative investment of over €340 million.

Navigator's responsible management strategy has been recognised by independent international entities, with the distinction of '2025 ESG Industry Top-Rated Company' by Sustainalytics, an 'A' rating in CDP Climate Change and CDP Forest, as well as the validation of its emission reduction targets by the Science Based Targets initiative (SBTi). The Company also obtained an 'A' rating in the MSCI ESG Ratings, which assesses companies' resilience to long-term ESG risks.

With an international industrial and commercial presence and a responsible growth strategy with a strong R&D&I component, The Navigator Company is now an integrated, competitive and innovative bioindustry, ready to continue creating economic, social and environmental value in a global context undergoing profound transformation.

A bioindustry on the right side of the future.

2.3. Creating sustainable value

The Navigator operations follow a responsible business model that balancing economic value creation with environmental and social pillars. We believe that **sustainability without performance does not generate impact**, just as **performance without sustainability does not guarantee the future**. This balance is a fundamental precondition to a responsible, lasting growth, with a focus on creating long-term value.

We enjoy a prominent position as regards wealth generation in Portugal, making a significant contribution to the economy and directly impacting thousands of people along the value chain – from Shareholders and Investors to Customers, Employees, Local Communities, Suppliers, and society in general.

Our impacts

€2 060 m
Direct economic value generated

€1 970 m
Turnover

7 829
Suppliers — 71% national

2.5%
of national exports of goods[13]

€1 915 m
Direct economic value distributed

€145 m
Accumulated economic value

€127 m
ESG CapEX (60% of total NVG CapEX in 2025)

90%
ESG-type financing[14]

€210 m
In projects aimed at Climate Transition and Digital Transition, within the scope of the RRP, by 2026

50 000
Direct, indirect and induced jobs generated by the eucalyptus industry[15]

1st place
National Value Added[16]

[13] Source: Figures published by INE for 2023.

[14] The percentage refers to the value of finance contracted.

[15] Source: PwC & Biond (2022). Study on the Impact of the Eucalyptus Industry - Executive Summary

[16] On the list of Portuguese exporting companies.

We have a reference **productive structure** at the international level, given both its size and technological sophistication, and based on which we have been able to grow. This strategy focuses on increasing our industrial and commercial capacity, optimising Iberian Customer portfolio management and strengthening our positioning in the Western European tissue market.

Our business strategy and the results obtained position us as **one of the largest Portuguese companies** in the national economy – we rank 3rd[17] in the list of the largest **exporters of goods** in Portugal. About 90% of our products are sold outside Portugal, to 117 countries.

Given the incorporation of natural endogenous resources sourced from planted forests into our value chain, and **income and job** created in Portugal, where we source the vast majority of raw materials and services, we rank first among exporting companies, providing the greatest contribution to the **National Value Added[18]**.

The eucalyptus sector, of which Navigator is a part, supports more than 50 000 direct, indirect and induced jobs; within its own operational ecosystem, the Company works with more than 7 800 suppliers, 71% of whom are national (Portuguese).

2025 was marked by high volatility, driven by conflicts in the Middle East and Eastern Europe, uncertainty as a result of protectionist measures and political instability in some developed economies, which have increased macroeconomic risks. Navigator, like other operators in international trade, has experienced a slowdown in economic activity in its key markets.

This sector faced strong pressure, evidenced by a sharp drop in pulp prices in China after April, with an impact on Europe. However, its extensive international presence allowed Navigator seize opportunities, increase its volume across all paper-related businesses, and gain market share.

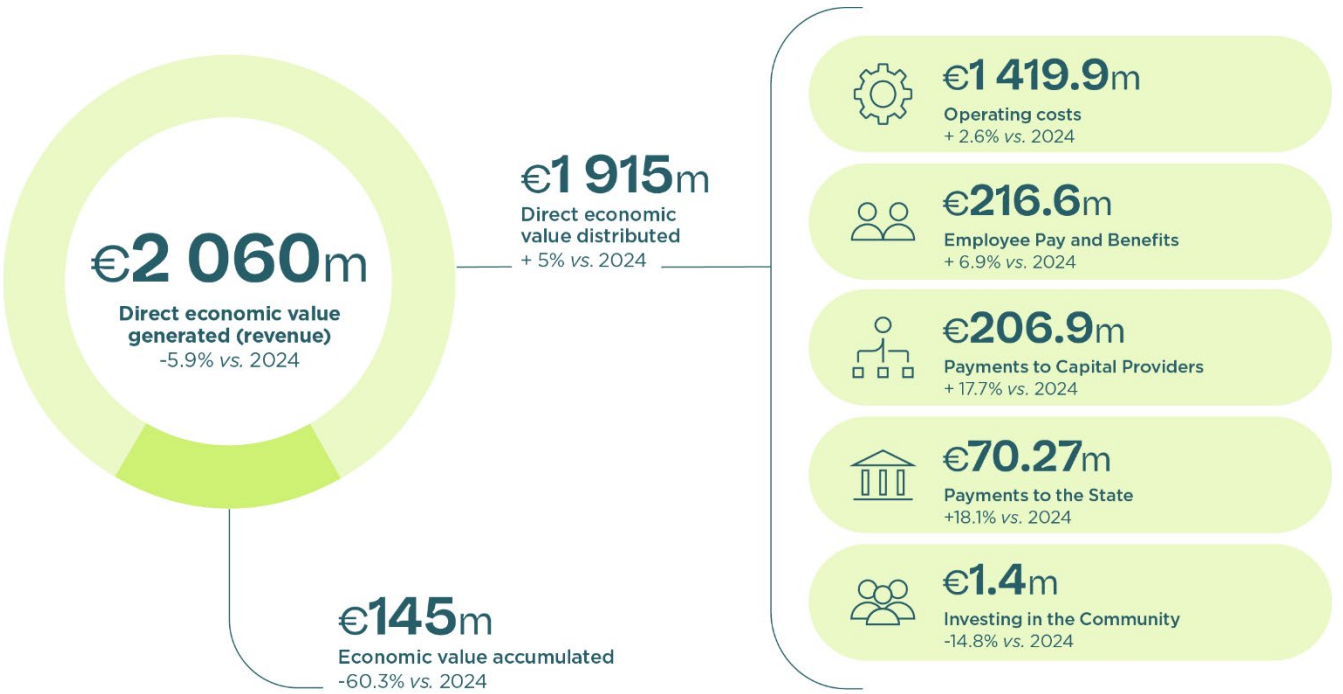
The Company has a clear focus on operational excellence and has been implementing programs to optimise and reduce variable costs. The production cost reduction path is a clear one, despite the temporary impact on energy and chemicals, whose effects should wane.

Navigator's forestry business strategy is deeply rooted in Portugal, given the location of its industrial complexes and the quality of eucalyptus-planted forest management. In 2025, the Company transferred around €236 million to several districts in Portugal.

[17] Source: Latest data published by INE in 2024, relating to 2023 (19 February 2026).

[18] Source: KPMG study - 2016.

Generated and Distributed Value



Creating long-term value

We undertake to **create long-term value** and **sharing it with several Stakeholders** (Chap. 3.4.5) as part of our identity, mindful of the several impacts of our activity on society and the fact that the economic and financial performance cannot be separated from the way we manage our relationship with Communities, our good management of the resources we use, ability to mitigate the risks inherent in our activity and, also, transparent communication and accessible to all.

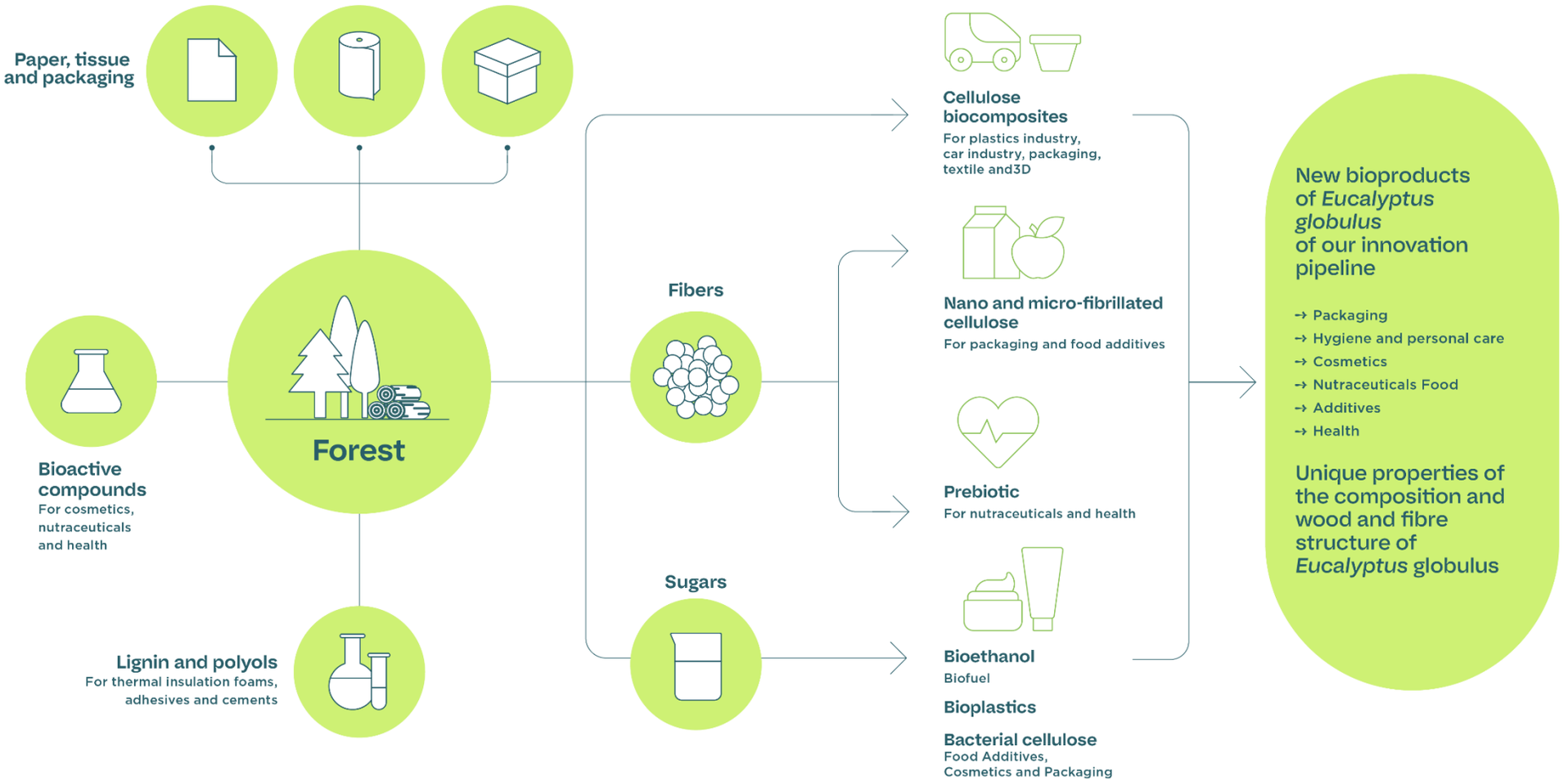
As expressed in our **Purpose**, we want to share with society not only our results, but also our knowledge, experience, and resources, committed as we are in leaving future generations a better planet through **natural, recyclable and biodegradable sustainable products and solutions** that help carbon fixation, biodiversity protection and combating climate change.

The way we conduction of responsible business, promoting sustainable development in line with the United Nations' Sustainable Development Goals (**SDGs**), is duly expressed in our 2030 Agenda (Chap. 3.4.2 and Chap. 3.4.3).

Customers are a strategic Stakeholder to The Navigator Company's success, and that is why we invest in a close business relationship and in meeting their needs. Strong brands and sustainable products (Chap. 2.2) remain essential factors, combined with a strong focus on innovation.

We invest in the creation of innovative and differentiating products, promotion of a new generation of bioproducts, alternative to fossil-origin solutions and development of potential new businesses aligned with sustainable development (Chap. 3.42.)

New bioproducts from our R&D programme



We keep abreast of market trends and sustainability challenges (Chap. 3.4.1) under our product **diversification** strategy, and we have taken important steps to this end. See, for example, the development and investment in the packaging business with the gKRAFT packaging paper line, which offers alternatives to fossil-origin plastics, thereby assisting the transition to renewable and low-carbon products. As part of the Packaging business diversification, the project for the integrated production of moulded eucalyptus pulp parts, intended to replace single-use plastic packaging in the food service and food packaging, is ongoing under the gKRAFT Bioshield brand.

In 2025, the first agreements were signed with large retail companies, and we entered the packaging segment for raw protein in modified atmosphere. This packaging mode requires exhaustive testing, under demanding industrial and supply chain conditions, to ensure their suitability to cold lines and conditions of packers and distributors, replacing the current non-recyclable PET/PE cuvettes with 100% recyclable and compostable packaging.

We contribute to the **rural economy**, development of the regions we operate in and improvement of forest areas under our management, with an impact on the surrounding Communities (Chap. 5.3.3). We are committed to enhancing the value of the entire **forest value chain**. Our focus is on taking advantage of the national forest's potential to produce a wide range of products. This potential is clearly there in the several regions where Navigator manages forest areas, specifically in Portugal, Spain, and Mozambique.

We propose to contribute to generating professional growth opportunities in different fields – from forests to the industry, from research to the final product – supporting and empowering our Eucalyptus Forest Producers, Suppliers and Local Communities. We promote the **employability** and **qualification** of young people (Chap. 3.4.2) and forest Producers, fostering a relationship of knowledge sharing, through pedagogical actions around the values of sustainable forest management and certification, to help the valorisation and protection of the forest.

While a pillar of all our operations, we invest in our human capital – e.g. in its qualification, recognition, motivation, health and well-being (Chap. 3.4.2). We support our Employees' families, and to acknowledge the dedication and commitment of our staff in achieving good Company results, we reflect this success by granting and reinforcing performance and productivity awards.

Portucel Mozambique

Regarding Portucel Mozambique's operations, the focus in 2025 was on strengthening its commercial operations to monetise forest assets and generate value in Mozambique in a sustained manner, supporting Navigator's operations in this country in the long run. The **project returns** include, along the entire **value chain of forestry activity** in Mozambique:

- Skilled **employment** and professional development – **269** permanent jobs are guaranteed – **96%** Mozambican, of which **21%** are women – and over **675** occasional and seasonal jobs (FTE – full-time equivalent) mainly in Communities.

- Generation of wealth and added value in the country, as well as environmental protection and investment in the Communities.

- It is worth mentioning the contribution to the creation of a forest-based industry cluster, both in the domestic and export market, based on favourable soil, climate and geographical conditions, positioning Mozambique and the Company in the international market of sustainable wood producers and exporters, also contributing to boost an industry focused on the domestic market and increase employment in the sector, which we estimate to be currently around 800 jobs.

- Returns also include the contribution to the development of Communities in locations where operations take place, through its **Social Development Program** (Chap. 5.3.3), which translates into an accumulated investment up to now of USD **8.9** million.

Financing and investment for sustainable development

Navigator is committed to ensuring that its **financing policies** and **sustainable development** include ESG criteria, and the objectives pertaining to achieving this are contained in the 2030 Roadmap (Chap. 3.4.4).

In recent years, we have followed an important path as regards sustainable finance, providing funding, if the conditions linked to the Sustainable Development Goals or ESG performance indicators under the 2030 Roadmap are duly met. In 2025, the implementation of this policy was clearly there in the loans contracted that year: €275 million ESG financing, reaching a 90% ratio (ESG/total) from the outset. Furthermore, €215 million ESG financing lines, unused on December 31, were contracted.

This financing enables the appropriate selection of maturities and risk terms, while its pricing clearly reflects a commitment to the defined sustainability goals.

Partnership work has also been promoted, and **funding applications** have been submitted to leverage the transition to a low-carbon economy and bioeconomy, thereby enhancing Navigator's contribution in this particular field (see next section).

It is worth mentioning the establishment of **Pension Fund Responsible Investment**. The entities contracted to manage pension funds pursue a responsible investment policy towards market sustainability in the long run, so that all assets meet environmental, social and corporate governance (ESG) criteria.

Selecting these managers includes assessing how they integrate ESG factors into their investment decisions and show that they play an active role in promoting sustainable investment. The Fund aims to achieve greenhouse gas emission neutrality across the portfolio by 2050 and will report on climate change metrics.

Financial Operation	Indicators		2021	2022	2023	2024	2025	2026	Associated SDGs
Sustainability-Linked Debt (Bonds and Commercial Paper)	**CO_2 emissions (EU ETS Basis), in tons**	**Goal**	-	554 613	537 815	535 895	533 975	532 054	SDG7 SDG9 SDG12 SDG13 SDG15
		Performance	-	552 587	457 990	452756	485 054 *	-	
	% acquisition of certified wood, domestic market	**Goal**	-	63%	64%	65%	66%	67%	
		Performance	-	65%	68%	73%	79%	-	
	% energy consumption from renewable sources	**Goal**	-	77.0%	77.7%	78.0%	78.3%	78.7%	
		Performance	-	76%	81%	80%	79%	-	

*Estimated value, subject to EU ETS verification

ESG Investment allocation

In 2025, the total **investments** amounted to €210 million (vs €241 million in 2024). The amount of investment includes mainly investments in structural and safety projects, equipment modernisation, and efficiency improvement and maintenance of production capacity.

Of these investments, about 60% (a total of about €127 million) were based on ESG projects and initiatives, including structural, environmental and decarbonisation projects. Some of the major Capex projects classified as ESG include, for example, the new recovery boiler in Setúbal (Chap. 5.2.1), the new biomass lime kilns in Figueira da Foz and Aveiro, the alteration of the fuel to hydrogen burners of the recovery boilers of Figueira da Foz and Aveiro and the biomass boiler in Setúbal, the oxygen de-lignification in Setúbal and the photovoltaic plant in Vila Velha de Ródão, thus helping speed up the Group's decarbonisation plan.

The Group is currently involved in four of the components (C5, C11, C12 and C16) of the **RRP - Recovery and Resilience Plan**, with eligible investments of around €259 million to be made by 2026.

Navigator continues to move forward as planned with projects under the Recovery and Resilience Plan (RRP). For eligible investments, the incentive rate should be around 40%, corresponding to around €100 million, of which the company has already received around €21 million in 2023, €25 million in 2024 and €31 million in 2025.

Component	Agenda	Eligible investment
C5 Business Capitalisation and Innovation	"From Fossil to Forest" Agenda TransForm Agenda Nexus Agenda Produtech R3 Agenda (Industrial Robotics)	€82.4m
C11 Decarbonisation of Industry	Decarbonisation Agenda	€173m
C12 Sustainable Bioeconomy	Be@t Agenda – Textile Bioeconomy	€1.7m
C16 Companies 4.0	Agenda within the scope of the "National Test Beds Network"	€2.2m
	Total Investment →	€259.4m

As for the several Agendas, we highlight the following ongoing RRP projects:

Agenda "From Fossil to Forest (Sustainable Packaging Products for Fossil Plastic Replacement" | Investment in R&D and productive innovation, in projects for the development of (i) high yield chemical pulp and brown papers; (ii) moulded cellulose for rigid packaging; (iii) biocomposites; (iv) paper with barrier properties; and (v) smart packaging.

Decarbonisation Agenda | Includes, among others, the following projects (i) new turbine in the Figueira da Foz co-generation unit, (ii) new lime and biomass kiln in Figueira da Foz, (iii) new recovery boiler in Setúbal, (iv) incineration of non-condensed gases (NCG) in the new recovery boiler of Setúbal, (v) new co-generation plant in Tissue Aveiro, (vi) new photovoltaic plant in Tissue Aveiro, (vii) new bleaching tower and pulp washing presses in Aveiro; (viii) new co-generation plant in Vila Velha de Ródão; (ix) new photovoltaic plant in Tissue VVR; (x) Conversion of the Lime Kiln 3 of Aveiro from NG to Biomass; and (xi) conversion of Fuel burners in CR4 Aveiro, CR2 Figueira and BC Setúbal for NG/H2 burning.

TransForm Agenda | Projects related to (i) genetic improvement and seed-producing orchards at Viveiros Aliança and RAIZ; (ii) remote sensing data for sustainable and resilient forest management; (iii) potentiation of the adoption of electric motorisation in the forestry sector in Portugal; and (iv) valorisation of industrial waste for the production of fertilisers.

Agenda Be@t – Textile Bioconomy | Highlight – (i) development of biocomposites for application in the textile industry and (ii) innovative non-woven fabrics, incorporating cellulosic paper fibre.

Produtech R3 Agenda | Projects for (i) robotic napkin boxer in Aveiro; (ii) artificial vision for the reception of Madeira; and (iii) automatic loading of trucks.

We also highlight a project for the Conversion of the Setúbal Lime Kiln 1, from Fuel/NG to Biomass, not included in the RRP, but under a European Innovation Fund program.

External recognition of our commitment to sustainability

Our commitment to creating value responsibly, while caring for people and the planet, is reflected in the positive external assessments by several independent entities, a catalyst for our own processes of evaluation and continuous improvement of ESG performance.

Our performance as a company with low ESG risk for investors earned Navigator recognition, by **Sustainalytics**, as "ESG Industry Top Rated Company" and a position in the prestigious global list of "2025 ESG Top-Rated Companies". We have also been awarded an "A" rating by MSCI ESG Ratings, which aims at measuring a company's resilience to long-term ESG risks, and have maintained **Ecovadis**' Gold rating. We were awarded internationally once again for our commitment to combating climate change and managing deforestation risks, and we reached last year the top "A" score in **CDP Climate Change** and **CDP Forests**, securing a place in the prestigious A-List, positioning the Company at the leadership level.

These awards, as well as those listed in Chapter 1 of this report, are a clear reflection of Navigator's commitment to leading the transition to a more sustainable business model. More than an external recognition, such achievements celebrate the collective effort of the entire Organisation and, in particular, the hard work and dedication of each and every Employee.

3. Strategy and governance

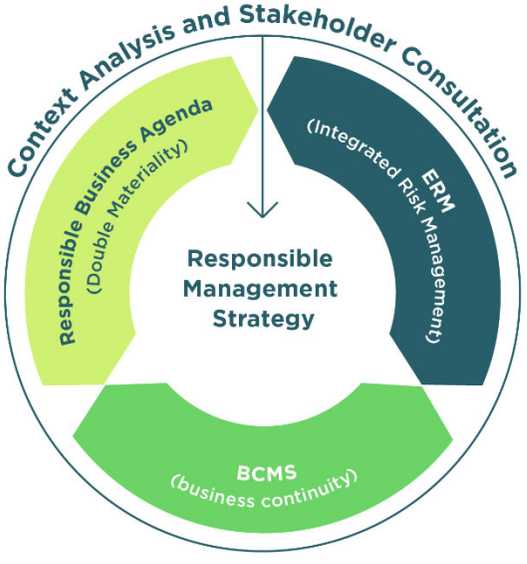
3.1. Business strategy

The Navigator integrates Sustainability into its strategic business vision. This concept promotes long-term balance between three essential pillars – Economic, Environmental and Social – and is critical for a development model focused on the needs of the present without compromising the future of People and the Planet.

With this positioning, Sustainability becomes a foundational value of the business and guides the way we continuously manage, monitor and assess our performance in the environmental, social and governance (ESG) fields – we have included this strategy in the 2030 Agenda and its implementation follows a more instrumental ESG framework.

The Company's **Responsible Management Strategy** is based on Ethics, Responsibility and Transparency. We are committed to producing forest-based products for the sustainable development and the well-being of society, in line with the United Nations 2030 Agenda.

This strategy is structured around three fundamental pillars - Enterprise Risk Management (ERM) (Chap. 3.3), Responsible Management Agenda (Chap. 3.4) and Business Continuity (Chap. 3.3)- ensuring a comprehensive and integrated approach to risks and opportunities, reinforcing organisational resilience, promoting Stakeholder confidence and supporting the creation of sustainable value in the long run.



Our solid financial position helps us to explore investment opportunities in the efficiency and innovation of core activities, identify new growth areas and advance business diversification.

Tissue

The Navigator Group is consolidating its foothold in the Tissue segment, a key pillar of its diversification and sustainable growth strategy. This business is based on valorisation of eucalyptus globulus fibre, a differentiating material given its quality, efficiency and performance, allowing the Company to offer high-added-value products that combine smoothness, strength and efficiency as regards the use of resources.

Under this strategy, analysis pertaining to investment in a new Tissue Machine (TM) with a capacity of 70 000 tons/year began in 2025, focusing also on optimising UK assets, maximising commercial and industrial synergies and identifying new M&A opportunities. In early 2026, the Company approved the installation of the new machine at the Aveiro industrial complex, a total investment of around €115 million (48 million in 2026, 53 million in 2027 and 14 million in 2028), to be supported by the Portugal 2030 program. The operation is scheduled to start in March 2028.

With this approach, we strengthen our presence in strategic markets, diversify our portfolio and create long-term value, thereby reinforcing the Group’s competitiveness and resilience.

Growth and internationalisation of The Navigator Company tissue segment was marked in recent years by a number of acquisitions that have significantly strengthened this business unit's industrial scale, geographical diversification and competitive positioning.

In 2023, the Group acquired the tissue business of the Spanish group Gomà-Camps, including the relevant industrial park in the Zaragoza region. With this operation, the Group improved its installed capacity, adding both tissue and processing-paper production capacity, and consolidated Navigator's presence in the Iberian market.

More recently, in 2024, the Navigator Group acquired the Accrol Group in the United Kingdom, integrating five production units focused on tissue and wet wipes, the latter a complementary category of hygiene and cleaning products. With this acquisition, Navigator significantly increased its finished product production capacity and expanded its presence to one of the main European consumer tissue markets.

The Company is committed to sustained growth, combining organic expansion through new products and increased capacity with selective growth via M&A.

Packaging*:*

The Navigator Company is consistently strengthening its commitment to developing sustainable packaging solutions, aligning its growth strategy with the principles of circular economy and decarbonisation of industrial activity. This guidance reflects the Group's commitment to long-term value creation, reconciling economic performance, environmental responsibility and positive social impact.

In 2025, under this strategy, The Navigator Company invested in redesigning the PM3 paper machine in the Setúbal industrial complex to adapt it to producing lightweight flexible packaging.

With this investment, PM3 can be equipped with state-of-the-art technology, thereby increasing operational flexibility, energy efficiency, and the quality of the final product. The conversion of this machine is geared to the production of highly technical, high-performing lightweight paper, suitable for flexible packaging applications to meet the growing demands of sustainability, functionality and performance in international markets.

Under the business diversification strategy and in line with the sustainability and ESG goals set, the Navigator Group entered new segments in 2023 and the early months of 2024, particularly flexible packaging. Results confirm the effectiveness of the diversification strategy focused on new packaging paper applications with eucalyptus fibre.

Energy

The Navigator Group is one of the largest renewable and sustainable energy producers in Portugal and 78% of the total energy produced in 2025 was generated from renewable sources.

In addition to generating energy from forest biomass, the Group has been expanding solar-based energy capacity in its industrial complexes. In 2024, construction of new self-consuming photovoltaic plants was completed at the Figueira da Foz, Aveiro and Vila Velha de Ródão production sites, increasing the installed capacity to around 38 MW. Navigator, thus, became the largest producer of solar energy in self-consumption mode in Portugal from an industrial context.

In connection with this, the Navigator Group is also investing in batteries (electrical storage), mainly for the provision of regulation-reserve system services.

From a medium/long-term perspective, Navigator continues to analyse the attractiveness of investing in green fuels, both biofuels (medium term) and e-fuels, or synthetic fuels (medium/long term).

The Group is focused on assessing assorted initiatives in the field of innovation and energy transition, including kraft biomethanol, e-methanol projects, as well as biogenic CO_2 capture and liquefaction projects. These initiatives are currently under both review and analysis, and are part of the Group's strategy to explore technological and sustainable solutions to help reduce emissions and create long-term value.

Biomaterials

With RAIZ, Navigator's R&D laboratory, the Group has also been studying and intensifying the development of new *Eucalyptus globulus* bioproducts, generating new business opportunities in the field of bioeconomy in a wide range of applications, in particular in the fields of hygiene and personal care, cosmetics, nutraceutics, food additives and the Healthcare sector, in addition to the aforementioned biofuels and synthetic fuels.

Mozambique

Investment in Mozambique is part of Navigator's internationalisation strategy, in a privileged geography offering easier access Asian markets in particular. It is based on favourable soil and climate conditions and areas suited to the development of a large-scale forestry and industrial project. In the medium and long term, the company has gained relevant know-how on how to generate value in an institutional, social and operational context that differs from the Company's traditional markets.

The Portucel Mozambique project contributes to the development of a forestry industry cluster in the country, positioning the company and Mozambique in international export markets and in the local market for sustainably managed planted trees for the production of wood.

After 10 years of operations, Portucel Mozambique is structured to market timber in both the international and domestic markets and to move towards industrial development (in a first phase of production
of chipping and, subsequently, production of pulp for paper), under the terms of the agreed conditions precedent with the Government of Mozambique. To date, the Company has planted more than 14 thousand hectares of eucalyptus, exported 285 thousand m^3 roundwood and sold, to local industries for the production of laminates and biomass, about 200 thousand m^3 roundwood.

The economic and social impacts already witnessed show the high potential of this sector, both for the development of the rural environment and at the national level: generation of more than a thousand direct jobs, on average, and respective professional training; investment of €8.5 million in community development reaching regularly 6700 households; bet on environmental protection; and strengthening the value chain, with more than €80 million contracted to Mozambican companies (more than 80% of the total suppliers). Regular engagement and communication with stakeholders, with emphasis on communities, improves the consistency and impact of the programs and recognition of Portucel's contribution to inclusive development in the project areas.

3.2. Governance model

Navigator Company has a **single management model**, with a Board of Directors (CA) composed of executive and non-executive members, a Supervisory Board and a Statutory Auditor (ROC). The General Meeting brings together all Shareholders who wish to attend: there are no limits as to the number of Shareholders wishing to vote.

The Company has the following internal committees:

Integrated in the Board of Directors:

- Executive Committee (EC)
- Corporate Governance Committee
- Talent Committiee
- Risk Oversight Committee
- Environmental Council
- Sustainability Forum

Not integrated in the Board of Directors:

- Remuneration Committee
- Ethics and Integrity Committee

Decisions regarding the definition of the **Company's strategy**, as well as its **general policies** and the Navigator Group's **corporate structure**, fall on the Board of Directors, and the Executive Committee is not empowered to do so. Non-executive Directors thus participate in defining the strategy, main policies, corporate structure, and strategic decisions, given the risk involved, and in compliance assessment.

Currently, there is no representation of employees and other workers in the Administrative, Management or Supervisory bodies.

The **management of the Company** is centred on the articulation between the Board of Directors and the Executive Committee.

Governing Bodies

Governing Bodies

Board of Directors

Chairman
Ricardo Miguel dos Santos Pacheco Pires

Members
António José Pereira Redondo
José Fernando Morais Carreira de Araújo
Nuno Miguel Moreira de Araújo Santos
João Paulo Cabete Gonçalves Lé
Dorival Martins de Almeida
António Quirino Vaz Duarte Soares
Ana Teresa Cunha de Pinho Tavares Lehmann
Hugo Alexandre Lopes Pinto
Maria Isabel da Silva Marques Abranches Viegas
Maria Teresa Aliu Presas
Mariana Rita Antunes Marques dos Santos
Vítor Paulo Paranhos Pereira

Executive Committee

Chairman
António José Pereira Redondo

Members
António Quirino Soares
Dorival Martins de Almeida
João Paulo Cabete Gonçalves Lé
José Fernando Morais Carreira de Araújo
Nuno Miguel Moreira de Araújo Santos

Supervisory Board

Chairman
Maria da Luz Gonçalves de Andrade Campos

Full members
José Manuel Oliveira Vitorino
Jorge Manuel de Araújo Beja Neves

Alternate Member
Marta Isabel Guardalino da Silva

Remuneration Committee

Chairman
Pedro Miguel Araújo Raposo

Members
Carlota Infante da Câmara Albergaria Caldeira
João do Passo Vicente Ribeiro

Officers of the General Meeting

Chairman
Rui Manuel Pinto Duarte

Secretary
Luís Nuno Pessoa Ferreira Gaspar

Company Secretary

Full
António Pedro Gomes Paula Neto Alves

Alternate
António Alexandre de Almeida e Noronha da Cunha Reis

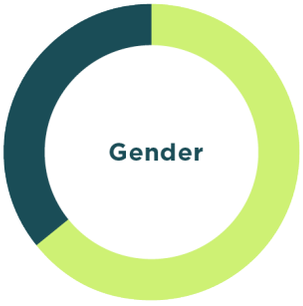
Chartered Accountant and External Auditor

KPMG & Associados - Sociedade de Revisores Oficiais de Contas, S.A

Represented by
Rui Filipe Dias Lopes, Statutory Auditor, registered in the Portuguese Institute of Statutory Auditors under No. 1715.

Alternate
Vitor Manuel da Cunha Ribeirinho, registered at the Portuguese Institute of Statutory Auditors under No. 1081

Details of the Board of Directors



- **69.23%** Men
- **30.77%** Women

- **76.92%** Non-independent
- **23.08%** Independent

- **92.3%** Portuguese
- **7.69%** Other

Average time on board

7.2 years
global average value

Simple average with extremes from 1 to 18 years

- **0** less than 1 year
- **5** between 1 and 5 Years
- **4** between 5 and 10 years
- **4** over 10 years

0.44 Average female to male ratio (4:9)

Members

6 Executive members
7 Non-executive members

Average Age

57 years

Age range

47 to 73 years

For more detailed information, see the Corporate Governance Practices Report. For further information on sustainability governance, see Chap. 5.1

Skills Matrix

Skills Matrix

	Genus	Year of birth	Position	Engineering	Economy	Management	Other areas of study	Business Management and Administration	Governance	Mergers & Acquisitions	Internal Expansion	Academic	Talent Management	Research and Development	Information Technologies	Sustainability*	Pulp and paper	Energy	Industry
Ricardo Pires	M	1976	PCA			●	●	●	●	●	●	●	●			●	●	●	●
António Redondo	M	1964	CEO	●		●	●	●	●	●	●	●		●		●	●	●	●
Fernando Araújo	M	1964	CFO			●	●	●	●	●	●	●			●	●	●		●
Nuno Santos	M	1970		●		●		●	●	●	●			●		●	●	●	●
João Lé	M	1963		●		●	●	●			●			●		●	●	●	●
Dorival Almeida	M	1966		●		●	●	●	●		●		●	●	●	●	●	●	●
António Quirino Soares	M	1974			●	●		●			●	●		●			●		●
Ana Lehmann	F	1972			●	●		●		●	●	●		●	●	●		●	●
Hugo Pinto	M	1978		●		●	●	●		●		●	●		●				●
Isabel Viegas	F	1958					●					●	●	●		●			
Mariana Marques dos Santos	F	1966				●		●	●		●	●	●		●				
Sandra Santos	F	1971			●	●		●		●	●	●	●			●		●	●
Teresa Presas	F	1952					●	●	●	●	●					●	●		●
Vítor Paranhos Pereira	M	1957			●			●	●	●	●		●		●	●			

* Includes competencies for the supervision of strategy, management of impacts, risks and opportunities, good practices and certification on topics related to (i) sustainable forest management and biodiversity conservation; (ii) climate action and energy; (iii) water management; (iv) circular economy; (v) people management; (vi) innovation, development and bioproducts; and (vii) value chain.

Table in context in section 16 of the Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company

3.3. Risk management

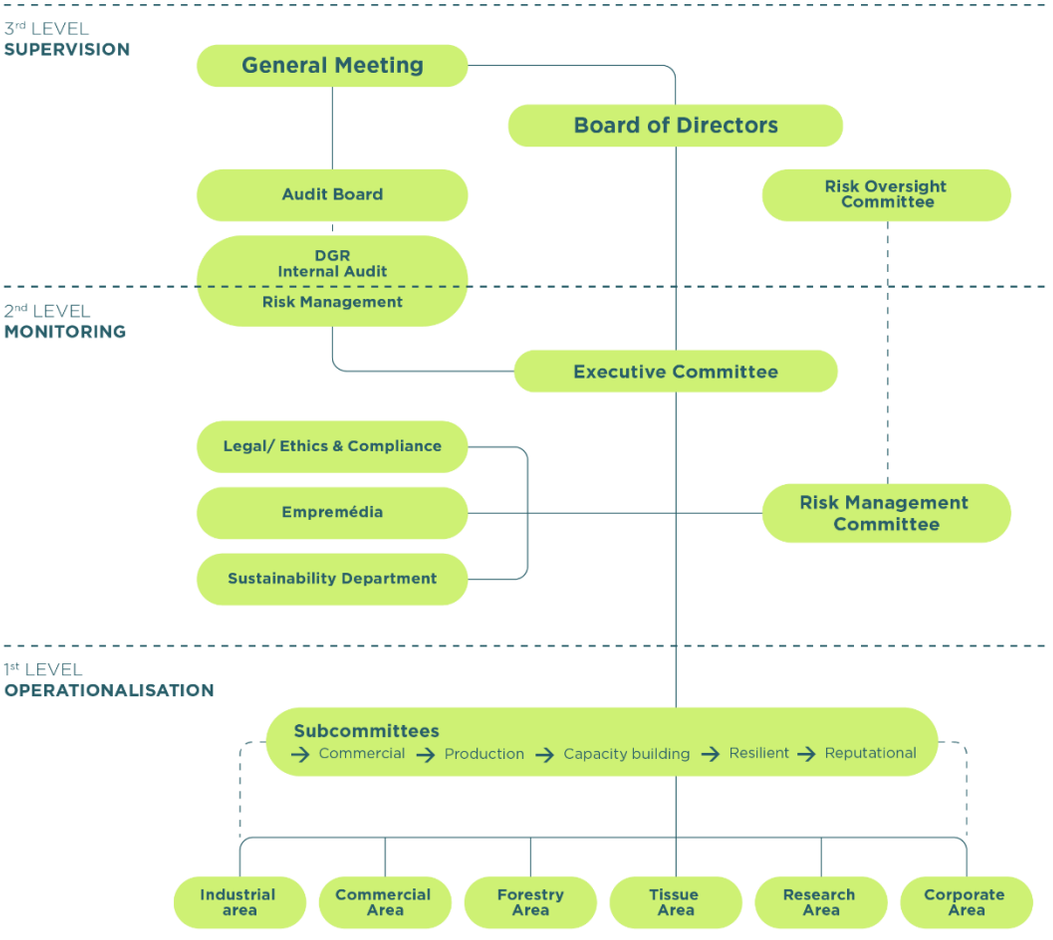
Risk management is a crucial process in our activity, providing a structured approach to identify, assess and analyse potential risk events that may influence the Group's objectives, and identify mitigation measures to reduce the likelihood of occurrence and magnitude of impact of these events.

In order to strengthen the Company's risk management process, in 2023, the **Risk Management Department** (DGR) reviewed and implemented a new **Enterprise Risk Management** (ERM) tool according to the guidelines of COSO - Committee of Sponsoring Organisations of the Treadway Commission and ISO 31000 Standard. The implementation of this tool involved several management departments within the Group, initially focusing on the UWF Paper and Pulp business lines. In 2024, the ERM was extended to new businesses, namely Tissue and Packaging. This tool brought greater alignment with the Group's strategy and objectives, as well as targeted and ongoing risk monitoring, and the responsabilities of the different stakeholders in this process were clearly defined.

The Risk Management Governance Model was also improved with the creation of a **Risk Management Committee**, whose main drivers are: (1) permanent monitoring of the Group's risks; (2) the need for risk management process empowerment; (3) specific risk management skills required; (4) articulation between different risk management areas and subsystems. In addition, subcommittees (Commercial, Production, Capacity building, Resilient, Reputational) were created whose main objectives are: (1) to integrate and articulate the relationship between risks; (2) to calibrate assessments and levels of risk appetite; (3) to monitor and put pressure on the need to mitigate risks; (4) to support risk responses (expertise); (5) to support and implement mitigation measures; (6) to communicate risk topics. The managers of each portfolio oversee the specific risks in each subcommittee. A **Risk Oversight Committee** was also established as a supervisory body.

This Risk Management Governance Model is aligned with the **3-line Model of IIA** - Institute of Internal Auditors, which involves: (1) in a first line, all business units in charge of carrying out daily risk management activities; (2) in a second line, the CEO, the Risk Management Department, the Ethics & Compliance Department, Empremédia – Corretores de Seguros (insurance brokers) and the Sustainability Department, in charge of assisting the implementation and monitoring of risk management and the Risk Management Committee, to ensure that risks are identified and well managed on an ongoing basis; (3) as for the supervision line, it includes the Internal Audit, the Audit Committee and the Risk Oversight Committee, to ensure that the first and second lines comply with the policies and standards established.

Risk management governance model



LABEL:

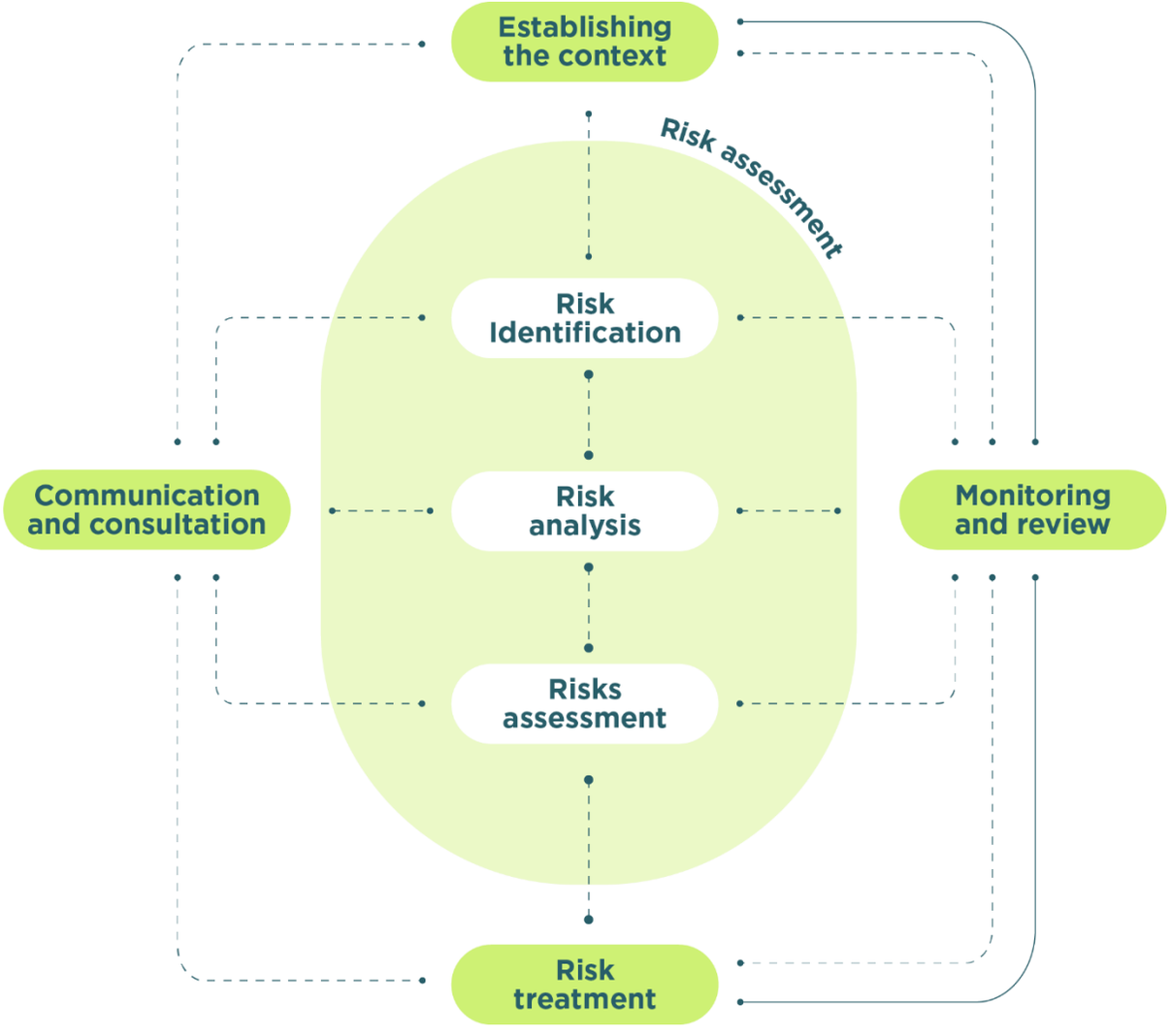
Direct communication - - - - - - -

Risk management process

Risk management at the Navigator Group is supported by the Risk Management Policy, approved by the Board of Directors, which (i) establishes the principles, guidelines and responsibilities for an adequate identification, analysis, assessment, treatment and response to risks and (ii) ensures convergence of risk management with the Group's strategic objectives, contributing to the promotion of a risk management culture in the organisation.

The Group's risk management process consists of seven interrelated phases, including an iterative process of continuous improvement, supported by both a communication and consultation process and a monitoring and review process. The following figure schematically illustrates the flow of the risk management process.

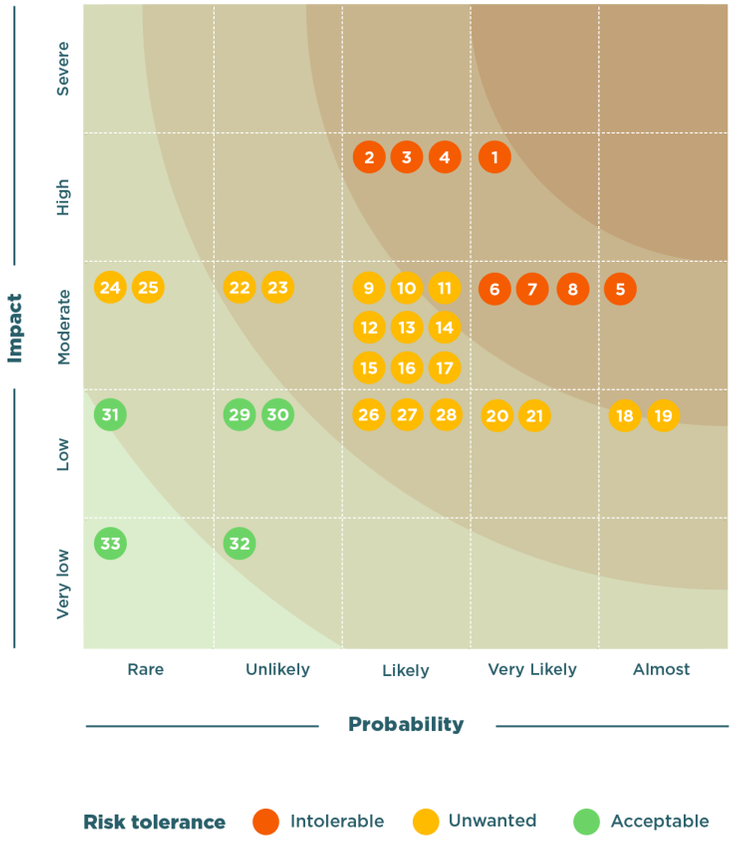
For more information on the risk management process, see Corporate Governance Report – Section C.III – Internal Control and Risk Management.



Main risks

The ascertainment of the main risks goes through several stages, including: (1) analysis of the internal and external context and definition of the Group's strategy and objectives; (2) conducting individual interviews with the 1st line directors to identify risks; (3) analysis of the link between risks; (4) inventory of risks by subcommittee; (5) Risk Owners' roles; (6) definition of risk appetite levels; (7) assessment of the inherent risk; (8) definition of existing mitigation measures; (9) assessment of residual risk; (10) preparation of the risk matrix. The key risks reflected in the risk matrix are updated annually. At Navigator, risk management is a key strategic component for ensuring the organisation's long-term resilience and sustainability. In 2024, the objectives linked to the commitment to integrate ESG (Environmental, Social, Governance) concerns into risk management, as established in our 2030 Roadmap, were completed. This move underscores the strategic relevance of ensuring that environmental, social and governance risks are addressed extensively and proactively across the organisation.

Mindful of the growing relevance of climate and natural risks to the future of business and the planet, Navigator has identified five macro-risks with climate relevance in its ERM. Navigator identified a set of risk factors for its business, conducted an in-depth risk analysis and assessed financial impacts. This analysis followed the TCFD (Task Force on Climate-related Financial Disclosures) recommendations and was incorporated into the ESRS E1 – Climate Change standard (Chap. 5.2.2.).



#	Macro-risk
1	Cybersecurity and information systems
2	Access to wood
3	Talent management
4	Evolution of the regulatory environment
5	Adverse weather events
6	Access to utilities
7	Logistics chain
8	Restrictive tariffs and trade policies
9	Price volatility
10	Competitive environment
11	Fraud
12	Access to funding
13	External context
14	Occupational health and safety
15	Public perception
16	Productive efficiency
17	Disruptive technologies and artificial intelligence

#	Macro-risk
18	Financial markets
19	Biodiversity conservation
20	Consumption changes
21	Asset valuation
22	Knowledge management
23	Business diversification
24	Access to raw materials
25	Non-natural environment disasters
26	ESG performance
27	Climate transition
28	Customer satisfaction
29	Governance
30	Innovation management
31	Adverse labour situations
32	Investment decision-making
33	Customers credit

Risk description

1 Cybersecurity and information systems

Risk of loss of security, confidentiality, transparency, integrity and availability of data and systems due to exposure to improper access or new forms of computer attacks or information theft, exploiting vulnerabilities in information, corporate and industrial control technologies.

2 Access to wood

Risk of actual unavailability of wood due to regulatory or legislative restrictions (e.g. restrictions on eucalyptus planting) and for failures in the promotion of productivity, resilience and sustainability of the national forest.

3 Talent management

Risk of inability to attract, retain, and develop talent to cope with the departure of resources in critical or dificult-to-replace business areas or to respond to additional resource needs.

4 Evolution of the regulatory environment

Risk of regulatory changes arising from policy options, in particularly at the tax, environmental or economic level, significantly affecting, directly or indirectly, the Group's operations and/or results.

5 Adverse weather events

Risk associated with adverse climatic events, whether of chronic origin (e.g. water stress) and/or acute (e.g. cyclones or floods).

6 Access to utilities

Risk of effective unavailability of utilities (e.g. water and energy) in industrial activity.

7 Logistics chain

Risk of non-existence or unavailability of sufficient logistical resources to operate, as a result of natural (e.g.bad weather) or market constraints (e.g. relocation of suppliers).

8 Restrictive tariffs and trade Policies

Risk of imposing tariffs, quotas or other trade barriers that affect the Group's competitiveness, production and exports in strategic markets.

9 Price volatility

Risk of price or margin fluctuations due to changes in market conditions.

10 Competitive environment

Risk of increased competitive pressures due, essentially, to the competitive positioning of producers with significantly lower production costs.

11 Fraud

Risk of fraudulent acts, corruption (e.g. conflicts of interest) and/or unethical behaviour affecting the Group or third parties.

12 Access to funding

Risk of unavailability of internal or external financing due to endogenous (e.g. over-indebtedness) or exogenous causes (e.g. contraction and negative prospect of business evolution, decrease in existing liquidity in the market).

13 External context

Risk of significant or disruptive changes in the Group's external context caused, for example, by the occurrence of pandemics (e.g. Covid-19), geopolitical conflicts and/or severe economic recession in major markets or at the European/global level.

14 Occupational health and safety

Risk of occupational accidents and/or failure to protect the health of employees as a result of non-compliance with safety procedures and rules or the occurrence of unexpected public health events (e.g. Covid-19).

15 Public perception

Risk of degradation, inability to monetise or valuation in the medium/long term of existing reputational capital, due to the effect of damaging reputation events or inaction in the management of existing reputational capital.

Risk description (cont.)

16 Productive efficiency

Risk of production inefficiency caused by the occurrence of errors and/or failures in the production process.

17 Disruptive technologies and artificial intelligence

Risk associated with the use of artificial intelligence technologies, with exposure to incorrect automated decisions, biases in data, lack of transparency and legal or ethical non-compliance.

18 Financial markets

Risk of exposure to unfavourable variations in the exchange rate and/or interest rate and applicable ratings, which negatively and significantly impact the Group's financial results.

19 Biodiversity conservation

Risk of loss of genetic variety, species and ecosystems, compromising the resilience of natural resources, sustainability and compliance with legal requirements.

20 Consumption changes

Risk of significant irreversible decline or discontinuity in the consumption of Group's products or markets as a consequence of new alternative products and technologies.

21 Assets valuation

Risk of loss in the valuation of assets that significantly impacts the value of the Group's balance sheet

22 Knowledge management

Risk of loss of accumulated knowledge in the Group (intellectual capital) motivated by the departure of employees in key functions with specific knowledge and/or experience and the lack of effective policies for sharing and imparting knowledge.

23 Business diversification

Risk of failure to identify new business opportunities, products or processes.

24 Access to raw materials

Risk of effective unavailability of raw material (e.g. chemicals) due to disturbances in supply chains.

25 Non-natural environment disasters

Risk of a serious environmental accident due to incidents of unnatural causes occurring in the assets under responsibility of the Group, with internal or external origin, corresponding, for example, to the explosion of industrial equipment or spillage of toxic liquids and contaminants from the environment.

26 ESG performance

Risk of poor strategic orientation in the management of ESG components with a significant impact on the Group's reputation and financial performance.

27 Climate transition

Risk arising from the process of adapting to a low-carbon economy, namely the Group's inability to adapt to structural and long-term changes, in terms of technology, regulation and the market (e.g. changes in consumer preferences).

28 Customer satisfaction

Risk of reducing the level of customer satisfaction as a result of the degradation of the product and/or provision of services.

29 Governance

Risk of inability or existence of unintentional failures in the Group's governance model.

30 Innovation management

Risk of reduced innovation activity with transformative impact on the business, mainly due to the lack of focus on the effectiveness of R&D&I processes, from the perspective of guidance and impact on the business.

31 Adverse labour situations

Risk of adverse employment situations due to non-compliance with the labour legislation in force and/or inadequate management of labour relations with workers, representation organisations of workers and trade unions.

32 Investment decision-making

Risk of difficulty in executing investments considered strategic and necessary for business development and operational efficiency.

33 Customers credit

Risk of difficulty or inability to collect all amounts granted as credit to customers within the agreed-upon timing.

The Corporate Governance Report includes a summary description of the several risks integrated into the ERM and the main recommended mitigation measures. For more detailed information on the alignment between the Navigator Group's main risks and the identified material sustainability themes, please refer to Chapter 5, Non-Financial Statement.

Business Continuity Management System

In 2025, Navigator implemented a Business Continuity Management System (BCMS), aligned with international best practices, namely ISO 22301 and ISO 22317, following the reinforcement of its Enterprise Risk Management model.

The objective of implementing the BCMS is to ensure the operational resilience, responsiveness and recovery of the business in the face of disruptive events, through a phased implementation, appropriate to the context and complexity of the Group.

In a first phase, the BCMS covers the industrial site of Figueira da Foz, considering the identified value chain and the critical macro processes. Also covered are Information Systems – Information Technology and Operational Technology (IT and OT) – which directly support and impact the operations of this industrial site. At a later stage, this BCMS will be extended to the remaining industrial units of the Group.

BCMS implementation, based on a cyclical model of continuous improvement, reinforces the integration of business continuity in the Group's management and decision processes.

3.4. 2030 Agenda and Roadmap

The Navigator Company's **Responsible Management Strategy** includes and underscores the Company's commitment to sustainability. We regularly analyse major global trends and the key challenges we encounter, with an ongoing focus on the surrounding environment.

The Navigator Company undertakes to develop a low-carbon and circular economy through sustainable management of its own forests, investment in renewable energy sources or focusing on the forest-based bioeconomy through bioproducts that may replace fossil-based products.

In the 2030 Responsible Management Agenda, Navigator comprehensively and ambitiously affirmed its commitment to Sustainability, supporting and monitoring its performance through an ESG framework, called the 2030 Roadmap.

3.4.1. Global trends and challenges for Navigator

At The Navigator Company, we closely monitor the evolution of the global context and its implications, continuously adjusting our strategy to ensure a successful and sustainable operation, even in uncertain scenarios. As a reference company in the forest-based bioindustry and in the national economic fabric, we acknowledge the importance of contributing to a more sustainable future. Our value chain and global reach allow us to respond to industry challenges and anticipate trends.

We have been faced with a reality marked by increasing complexity and instability, driven by geopolitical and financial tensions that put our Purpose to the test. However, we believe that, in addition to the challenges, these contexts may pave the way to new opportunities. Demanding situations are often drivers of innovation, where ambition, commitment and resilience are key to achieving concrete and lasting results, reinforcing our ability to generate sustainable value over time.

The World Economic Forum (WEF) 2026 report offers a comprehensive analysis of the challenges that will shape the global landscape, highlighting the growing interconnection between geopolitical, environmental, social and technological risks, reinforcing the need for international cooperation and innovative strategies to ensure stability and resilience.

The creation of our Responsible Business Agenda, or 2030 Agenda, followed the analysis of the main macro trends and challenges that may, directly or indirectly, impact the Company's business, and the relevance of the main sustainability themes. We have been reviewing these assumptions to ensure that the company remains up-to-date and capable of responding to a constantly changing context: we conducted, in 2024, a review of the double materiality analysis (Chap. 5.1), which resulted in an adjustment to the material topics and, in early 2025, we reviewed the main macro trends and challenges, in light of global sustainability trends.

We concluded that, the macro trends and challenges identified in previous years remain relevant, and we updated only the descriptors to reflect the current context.

Below is a summary of the most relevant macro trends that influence our operations' context.

Macro trends identified as relevant

Planet on the edge	Demographic change	Innovation and technology	Disruption of social cohesion	Geopolitical and economic instability
Existential threat to Earth and human life, risks of biodiversity loss and climate change exposes the limits of the planet, both in the short and the long term. Resource scarcity, deforestation and pollution increase environmental degradation and the appearance of zoonotic diseases. Rising temperatures and imbalance in the earth system leads to more frequent and harsh climatic phenomena, causing suffering and migration, and imposing economic costs and losses. Worsening water stress and water scarcity could affect more than half the world's population by 2050. Soil degradation will have a material impact on agriculture in many regions. Air quality will continue to be a concern in many cities, with severe consequences for public health. Critical changes in terrestrial systems are identified by the WEF as the third most severe global risk over the 10-year horizon.	Global population growth, ageing and urbanising. Demographic evolution, increased involuntary migratory flows and megacities' growth put additional pressure on natural resources. Demographic differences impact economic development, both due to population ageing and intergenerational differences. Reversing the demographic pyramids in some parts of the world can lead to the failure of social security systems and the need for employment of the older generations. Power transfer from Boomers to Millennials and Gen Z reflects different experiences and perspectives, challenging companies to stay relevant in their purpose, invest more and care for their human capital, on which their competitiveness depends.	New technologies, such as digitisation, automation, Artificial Intelligence (AI), blockchain or big data, will allow companies to accelerate and amplify their positive impact on the sustainable development of the economy and society. Key technologies in different areas (from biotechnology to renewable energy) should witness an exponential development. Implications of the development of new technologies in the future of work (through the creation or loss of jobs), impose new or renewed skills. Risk of increasing digital inequalities in access to critical networks and technologies. Increased dependence on cyber and data systems. Increased vulnerability to cyberattacks and risk of new levels of surveillance and manipulation of government data. Risk of misinformation and misinformation is the second-highest global risk in a 2-year horizon (WEF). Adverse outcomes of AI technologies are one of the most severe global risks over a 10-year horizon.	Increased social fractures, uncertainty and anxiety. Increased inequality within and between countries, along with the erosion of trust in institutions, fuels a diverse set of protest movements, which can lead to the polarisation of domestic politics, populist and nationalist sentiments, and authoritarian regimes. Feelings of uncertainty, anxiety, depression, loneliness and stress, as a result of future uncertainty and misinformation, potentiate a degradation of social cohesion. Increased inflation, loss of purchasing power and structural deterioration in labour prospects and/or patterns regarding the age of the working population may lead to employment and subsistence crises, as well as the erosion of labour rights. Differences in access to technology and digital skills increase the risk of a gap between “rich” and “poor”, challenging social cohesion.	Geopolitical instability, economic slowdown and changes in power and resulting departure from multilateralism. Trade tensions are likely to remain a feature of the geopolitical landscape throughout the decade, most notably the swings in tariffs imposed by the US and the related trade war with the Asian bloc. These phenomena cause volatility in the prices of goods and products. The gravitational centre of the global economy is shifting to Asia, but also to Africa and Latin America. Nationalisation of resources and competition between states for control of vital raw materials are likely to become an increasingly important factor in international relations, with resulting impacts on supply chains and their shortening. Higher interest rates, coupled with falling yields in real terms, are driving the economy into recession. Talent and labour shortages, economic recession, insufficient public services and lack of social protection, poverty and inequality and public debt are the main risks identified by Portuguese business leaders (WEF's Executive Opinion Survey 2025). Geoeconomic conflict rises to first place in the WEF ranking in the 2-year time horizon.

This context translates into assorted challenges for Navigator's business, identified in a process that involved the participation of external and internal stakeholders: (i) Protect and value biodiversity; (ii) Climate mitigation and low carbon economy; (iii) Sustainable consumption; (iv) Circular economy; (v) Technology for the common good; (vi) Future of work; (vii) Investment in human capital; (viii) Protection of fundamental rights; (ix) Resilient and sustainable value chains; (x) Participation in the adaptation of the regulatory framework; and (xi) Stakeholder Capitalism.

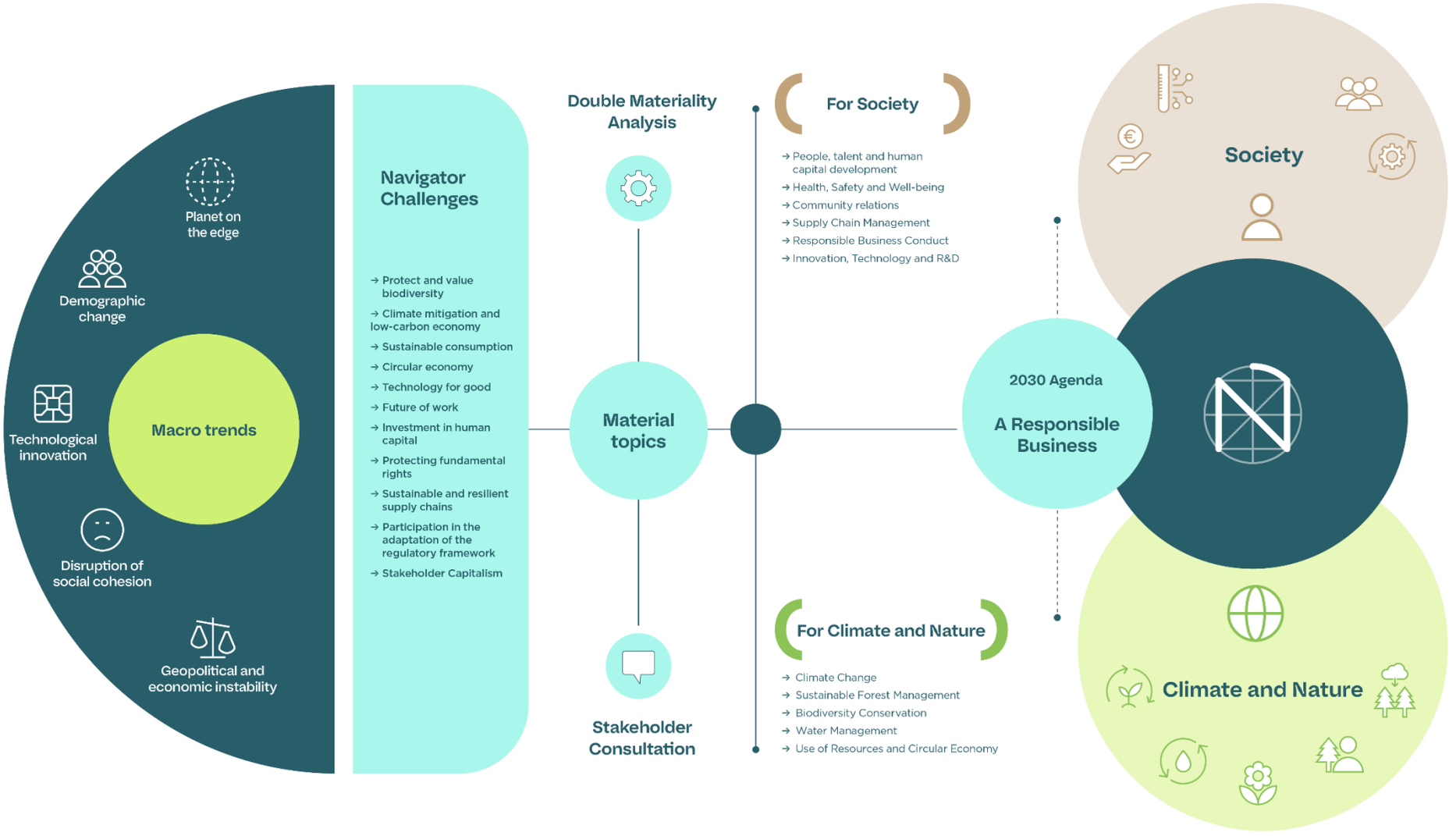
3.4.2. Our Agenda

The Navigator Company's 2030 Responsible Management Agenda is based on the principle of "Create Value with Accountability" and was developed to reinforce the Company's positive long-term impact and its contribution to sustainable growth in line with the demands of a constantly evolving world. To manage it, we have defined a strategy based on a governance structure that promotes economic success in a fair and balanced manner, taking into account the interests of our Stakeholders and encouraging their cooperation (Chap. 3.4.5).

We base our management on Ethics, Responsibility and Transparency principles and, true to our Purpose – centred on people, their quality of life and the future of the planet – we assume the responsibility of developing products and forest-based solutions that promote sustainable development and social well-being, in full alignment with the United Nations 2030 Agenda (Chap. 3.4.3).

We have adopted a positioning focused on long-term value creation, reinforcing performance, and business resilience and corporate reputation, while making sustainability a strategic competitive advantage (Chap. 2.3).

Global Trends



To ensure that our efforts are focused on the largest impact areas, we have conducted a review of our double materiality analysis (Chap. 5.1), identifying Impacts, Risks and Opportunities. This process led to the definition of 11 material themes (or topics) and the resulting update of the 2030 Agenda, which remains structured in two strategic axes of action – by Climate and Nature, and by Society – each with a specific orientation and aligned with two dimensions of our Purpose: People and Planet.

Strategic Axes of the 2030 Agenda

For Climate and Nature – Act: Preserve and value natural capital, thus generating economic, environmental and social value, by minimising the ecological footprint and optimising efficiency in the use of resources; Contribute to a circular and low-carbon economy, based on innovation, technology and R&D.

For Society – Grow: Apply ethical principles, integrity and transparency in everything we do, manage risk, promote respect for Human Rights and make commitments to our Stakeholders; Develop our people, engage Communities, and share value with society fairly and inclusively.

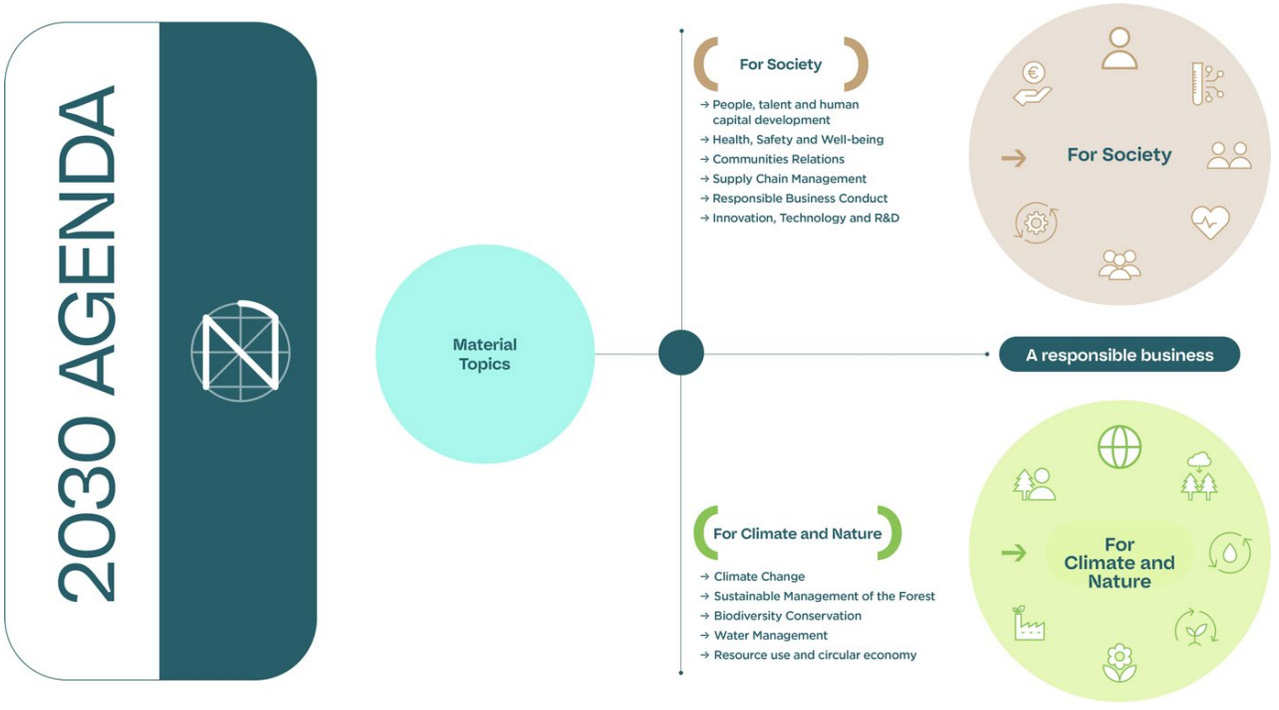
Material topics of the 2030 Agenda

The material topics of the 2030 Agenda underwent only minor adjustments in designation and scope, in light of the results of the dual materiality review conducted at the end of 2024, and to more clearly reflect their connection to ESRS standards, preserve its essence and focus of the relevant issues. The following table shows this interconnection between the standards and our 11 material topics:

Material ESRS-themed standards	2030 Agenda - Material topics
Environment issues → E1 - Climate change → E3 – Water and marine resources → E4 – Biodiversity and ecosystems → E5 – Resource use and circular economy	**Climate and Nature Axis** (5 material themes) → **Climate change** → **Water management** → **Use of resources and circular economy** → **Biodiversity conservation** → **Sustainable Forest Management** (*)
Social issues → S1 – Own workforce → S2 – Workers in the value chain → S3 - Affected communities	**Society Axis** (6 material themes) → **Innovation, technology and R&D** → **People, talent and human capital development** → **Health, safety, and well-being** → **Community Relations** → **Supply chain management** → **Responsible business conduct**
Governance issue → G1 – Business conduct	

*Entity-specific disclosure

See below the material Navigator topics, according to the strategic axes of the 2030 Agenda.



For Climate and Nature: Act

Climate change

We are an industrial company and are aware that our operations have an impact on the consumption of natural resources, through our operations and value chain and resulting atmospheric emissions, odour generation, liquid effluents and waste, among others. Among these, greenhouse gas (GHG) emissions stand out, with potential negative impacts on the environment and worsening the effects of climate change. Energy consumption and production is a relevant topic in the context of Navigator's operational performance and resource management, accounting for substantial costs and profits and is an important component of the total GHG emissions generated.

On the other hand, our forestry activity offers a positive contribution to carbon sequestration. Eucalyptus forests sequester the largest amount of CO_2 per hectare and per year, totalling about 11.3 tons of CO_2/hectare per year – almost 3 times more than pine forests (with 3.9 tons of CO_2/hectare per year) and 7 times more than cork oak forests (1.6 tons of CO_2/ hectare per year)[19]. Regarding climate risks, our approach is aligned with the Task Force on Climate-related Financial Disclosures (TCFD), and the Company implemented these recommendations in 2022. TCFD recommendations have been implemented in the management strategy and processes of climate risks, the assessment of potential financial and strategic implications and the development of appropriate responses.

[19] Calculations made based on the National Forest Inventory 6, published by the Institute for the Conservation of Nature and Forests (2015), considering all types of stand (pure, dominant and irregular) and for all biomass components.

Our commitments to the issues of climate change and energy are expressed in the 2030 Roadmap (Chap. 3.4.4), and aim to:

- Promote efficiency in the use of resources, minimising our ecological footprint, to optimise the energy intensity, year after year;
- Investment in low-carbon solutions towards carbon neutrality, based on the implementation of the Navigator's Decarbonisation Roadmap
- Ensure the sustainability of land use and forest resources, including biodiversity, to ensure that the stock of CO_2eq sequestered in forest areas under Navigator's management in Portugal does not decrease by more than 10%, compared to 2022.

We develop and incorporate technologies and practices to protect the environment and prevent air pollution, in compliance with applicable legal requirements and best practices.

Our commitment to investing in low-carbon solutions materialised in our clear and measurable decarbonisation goals. In 2019, we set the goal of reducing direct CO_2 emissions under the ETS by 86% by 2035, compared to 2018, and we were among the first Portuguese companies to publicly affirm this ambition. Our commitment was reinforced in 2022 with the extension of our climate ambition and establishment of two new emission reduction targets, covering scopes 1, 2 and 3 of the full greenhouse gas inventory. These goals were submitted to and approved by the Science Based Targets initiative (SBTi), which recognised our science-based climate targets as a key element in Navigator's journey towards net-zero decarbonisation.

In addition to contributing to the mitigation of climate change, our decarbonisation plan has a positive impact, due to the use of residual forest biomass for energy production – valuing this resource and promoting the protection of forests against fires – and the generation of electricity, through renewable sources. We are gradually replacing fossil energy consumption with less carbon-intensive energy sources and investing in solar photovoltaic energy to produce electricity for self-consumption, thereby reducing energy costs.

We are a bio-industry on the right side of the future, based on the eucalyptus sector and the pulp and paper industry, and we promote a forest-based bioeconomy with potential positive impacts.

It is worth mentioning that forests and forest-based products produced by Navigator represent an important form of biogenic carbon sequestration. The sustainable management of the forest spaces under our responsibility potentiates this positive impact, both in planted forests and in the preservation of forests with conservation interest.

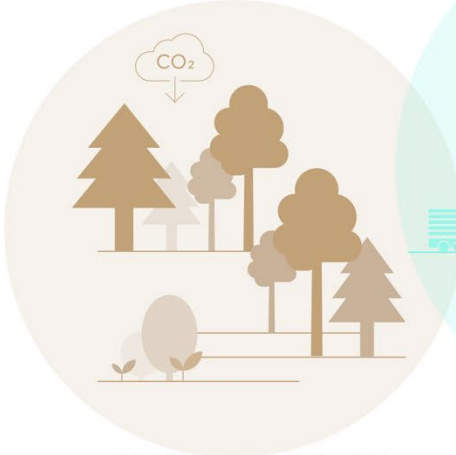
Also in Mozambique, actions are being developed towards the reduction of emissions, such as conservation agriculture techniques that mitigate the effects of itinerant agriculture, actions to raise awareness of the reduction of fires, among other activities developed under the Social Development Program (Chap. 5.3.3).

We also invest in the development of innovative bioproducts and solutions (Chap. 3.4.4), in partnership with several entities and partners, taking, in line with current climate science, an active role in the development of a sustainable, low-fossil carbon, nature-friendly and climate-neutral circular bioeconomy.

Our work was duly acknowledged, and we assume a leading position in climate action. In 2025, we were awarded the "A" classification in CDP Climate Change.

Sequester
in our forests

Sustainable management of forests as a natural solution for the climate through carbon sequestration and storage during its growth



110 741* **ha** of forest area with certified management in Mainland Portugal, in 2025

6.6 **m tCO$_2$eq** of accumulated stock, distributed as follows:

- → Eucalyptus area (73% of the area managed by Navigator): about **5.4 m tCO$_2$eq**
- → Woodlands of Cork Oak Area , of resinous and other forest species under the Company´s management: about **1.0 m tCO$_2$eq**
- → Agricultural areas, areas with shrub or bush species: about **0.2 m tCO$_2$eq**

* In addition, 1,488 hectares of forest are managed in Galicia (Spain), 153 hectares in the Azores and 26,932 hectares in Mozambique.

Reduce and Capture
associated with our production process

Energia

- → Certification by the ISO 50001:2018 Standard in all industrial units
- → Implementation of energy efficiency projects in industrial units, in alignment with the commitment to improve energy performance
- → Phase-in replacement of fuel oil consumption with less carbon-intensive energy sources
- → Investment in renewables, such as solar photovoltaic for self-consumption and biomass
  - Solar PV: **38 MWp** of installed power in more than 71,000 solar panels

Store
in our products

Forest-based products store carbon over time, allowing reincorporation into nature at end-of-life

Paper is a sustainable product:

- → Natural origin
- → Renewable
- → High recyclability rate
- → Biodegradable

3.8 **m tCO$_2$e** of biogenic carbon contained in products marketed by Navigator in 2025

Leverage
the bioeconomy and the low-carbon fossil economy

Low-carbon fossil solutions

Production and sale of renewable electricity through the use of residual forest biomass

- → Renewable Biomass Co-generations (CoREN): **199 MW** of installed power
- → Biomass Thermoelectric Power Plants (BTPP): **25 MW** of installed power

Innovation

- → Investment in bioproducts

Water management

At The Navigator Company, we use the water resource throughout the process, from forest production to the finished product. We are aware that rainfall patterns in the Iberian Peninsula have changed in recent years, leading to increased water scarcity levels in several river basin districts where the Company operates, especially south of the Tagus.

We assess climate scenarios and the impact of climate change on water resources through monitoring actions and analysis of specific hydrological models in the river basins we operate in. We assist the development of Management Plans for Hydrographic Regions (PGRH), ensuring representation in the respective Hydrographic Region Councils and incorporating the resulting recommendations and guidelines in our evaluation model.

We identify and assess **water-related risks** to our own operations and supply chain, including, for example, physical risks – acute and chronic – such as droughts, water scarcity, water stress, changes in precipitation patterns, salt intrusion, sea level rise, as well as transition, regulatory and technological risks. We also quantified the financial impact of the main risks according to the TCFD recommendations (Chap. 5.2.2 and 5.2.3).

We consider it imperative to ensure that our activities are not *per se* an additional risk factor for the environment and surrounding communities. Water management is one of the key themes of the Community Monitoring Committees, and whose contributions we incorporate in the definition of water management plans and actions, namely in the development of our Water Use Reduction Program.

We have several **mitigation and adaptation measures** in place and underway to address the risks identified and reduce the use of this vital resource.

Our **commitment to responsible management** of water resources focuses on the quantity captured and the quality of the water discharged. Thus, we defined within the scope of our 2030 Roadmap (Chap. 3.4.4), the following objectives in relation to industrial operations in Portugal:

- The promotion of efficiency in the use of resources, minimising our ecological footprint to study the potential for reduction and consumption of water in the Espirra nursery, monitoring the impact of the production forest on water management, reducing the use of specific water and reducing the organic load in the effluents.

Regarding Mozambique, the aims of monitoring the impact of production forests on water management are part of the plan.

Main initiatives to optimise water use in forestry operations in Portugal

Reinforcement of R&D activities with regard to forestry practices aimed at conserving water in the soil

Drip fertigation tests, which seek to find solutions to mitigating wood productivity losses in areas with water scarcity and greater efficiency of water use, are one of the examples of ongoing projects. It is essential to highlight that these scientific trials are in compliance with the legislation and are subject to interruption in extreme drought cases, thus ensuring environmental responsibility and precaution in the face of adverse conditions.

Recognising the role of organic matter in soil water retention, further knowledge in this field was promoted through a comprehensive analysis of the organic carbon content in the soil in areas under the Company's management.

Continuous investment in knowledge of the influence of soil and climate on the productive capacity of stands, as well as in the study of forestry practices adapted to local conditions that integrate not only plant knowledge, but also seek to promote conservation and greater retention of water in the soil.

Reinforcement of R&D activities with regard to hydrological responses in forested basins and the use of water by eucalyptus

Research project, in partnership with the University of Aveiro since 2019, consisting of the monitoring of two experimental basins instrumented to monitor the availability of water (quality and quantity), trying to understand the dynamics of hydrological response throughout the development cycle of the stands. In addition, these data are used to feed the hydrological modelling (with the SWAT model – Soil and Water Assessment Tool). As a result of the project, several works have already been published in magazines of international circulation that deal, for example, with the hydrological response to different climate change scenarios, and the effect of terraces on soil conservation and water retention at the basin level.

The "WiseGum" project was started in collaboration with FCUL, to assess water sources in use by eucalyptus and other coexisting forest species.

Search for solutions – genetic and practical materials – that enhance greater resilience to water scarcity

Genetic improvement program, R&D activity, aiming to create the best individuals for crops, increasingly directed to resistance to drought and tolerance to pests and diseases. Annually, the materials in production are reviewed, and a new recommendation is defined with the eventual introduction of new genetic material.

In places with greater water scarcity at national level, innovative solutions were tested, including water-retaining polymers and other commercial products applied to the plantation, to strengthen the initial resilience of plants in the early days on the ground. For the same purpose, knowledge about the application of silicon and biofertilisers before planting.

Alteration of irrigation methods in Viveiros Aliança

Implementation of drip fertigation to minimise water losses and reduce consumption. It is worth mentioning that between 2022 and 2024, irrigation of approximately 1.2 ha resulted in a total of 18,500 m^3 savings. In addition, we refer to the installation of an ultrasonic flowmeter, which will allow the quantification of drainage losses, with information in real time, and the implementation of a circuit for the reuse of this water in social areas, namely for watering gardens.

Use of Resources and Circular Economy

Planted forests play a crucial role in the transition from a linear, fossil fuel-dependent economy to a **low-fossil-carbon circular bioeconomy**. This transition is supported by renewable, recyclable and biodegradable forest products, promoting benefits for nature and contributing to carbon neutrality.

The wood we use at The Navigator Company comes from sustainably managed forests (Chap. 5.2.6. This is transformed into various types of paper products, which, after serving their purpose, are collected and recycled, becoming raw material again. *Eucalyptus globulus* fibre, which we plant in Portugal, is recognised for potentiating a greater number of recycling cycles than its competitors. A comparative analysis carried out by RAIZ – Forest and Paper Research Institute shows that this species can withstand ten recycling cycles – two to six more than other paper fibres[20].

We thus position ourselves strategically, investing in Research, Development and Innovation (RDI) projects for the implementation of the best techniques available to the sector and in the search for innovative bioproducts and solutions, developed in partnership with several entities (Chap. 3.4.2).

Our 2030 Roadmap (Chap. 3.4.4) reflects the importance of using resources and promoting the circular economy through a set of **commitments and objectives**. It is worth mentioning, with regard to raw materials and waste:

- The promotion of the efficient use of resources, minimising our ecological footprint, proposing solutions to improve efficiency in the use of wood in the industrial process;

- The promotion of the circular bioeconomy, privileging R&D solutions. In this context, the aim is to develop sustainable and value-added applications for the industrial process by-products and to achieve, by 2030, a waste disposal rate in industrial landfills below 10%[21].

We invest in solutions that promote **efficiency and the responsible use** of raw materials, energy (Chap. 5.2.2 and 5.2.5) and water (Chap. 5.2.3), as well as the **reduction and valorisation** of the waste generated. In this way, we seek to reduce the environmental impact resulting from our activity, fostering a constant improvement in our performance and paving the way to a low-fossil-carbon circular economy.

The pulp production process used by the Company since its inception, the **kraft process**, is based on the fundamental principles of the circular economy, in which the secondary streams of materials generated in pulp production are cyclically reused, minimising the use of virgin raw materials. The sodium-based chemical compounds used in wood cooking to produce cellulose are recovered locally, in the so-called "sodium cycle". After cooking, these compounds flow into a stream known as “black liquor,” which is rich in lignin; this, in turn, is used to generate enough thermal energy to power the pulp production process and to produce electricity sold to the grid. For the recovery of sodium-based compounds, other calcium-based compounds are used, which, once they are used, are also recovered locally, in another parallel cycle, referred to as the "calcium cycle".

[20] Source: Info Tecnicelpa no. 54, pgs. 30 and 31 - https://www.tecnicelpa.com/files/Info54_marco2018.pdf

[21] The goal defined does not derive from a legal requirement; it was established voluntarily, similar to the other goals contained in the 2030 Roadmap

We take advantage of the potential of the circularity inherent in the process and continuously invest in **closing circuits and optimise the use of resources**, prioritising the reduction of waste production, as well as its recycling and valorisation.

We adopt technological solutions that enable the **reincorporation of waste in production processes**, or its **internal recovery**, namely in energy production. This type of solutions also minimises the use of virgin raw materials and reduce effluent waste and load (Chap. 5.2.5). The vast majority of waste is generated in pulp production operations. Mindful of this, we have invested in improving the efficiency of processes and treatment systems, reducing their production to minimum levels.

The promotion of the circular economy has been leveraged through the **Upcycling Corporate Project**, investments in RDI projects and the establishment of **partnerships and synergies** with other organisations and sectors.

It is worth mentioning that the **recovery and reuse of water** is also part of the circularity of our production process and is mostly returned to the environment as treated effluent (Chap. 5.2.5).

Circular economy approach

Industrial Symbiosis

- Development of industrial synergies with other sectors, towards circular use of materials.
- Use waste produced by the Company as secondary raw materials, replacing virgin raw materials with extended service life.

  Examples:
  Partnerships in ash and sands and Mobilising Agendas.

Investment in bioproducts

- Creation of forest-based bioproducts, a sustainable alternative to fossil origin materials, promoting the transition to the bioeconomy model.

  Examples:
  Initiatives under the From Fossil to Forest Agenda.

Optimisation and process improvement

- More efficient use of resources, minimising virgin raw materials, water and energy use, and avoiding waste and waste production.
- Processes and treatment systems Improved efficiency.

  Examples:
  PRUA - Water Use Reduction Program.

Networking

- Partnership building, with universities, research centres and other industrial sectors, to enhance circularity the materials – for the development of bioproducts, waste recovery and knowledge-sharing.
- Participation in the Circular Bioeconomy Alliance platform
- Co-promotion projects:
  - Initiatives under the be@t Agenda – Bioeconomy in Textiles and Clothing

Reincorporation of by-products in Navigator's processes

- Optimisation of chemical recovery cycles in pulp production units.

  Examples:
  pulp production
  kraft process

Waste management

- Selective collection of waste, correct packaging and forwarding to an appropriate final destination, favouring recovery operations, whenever possible.

Research, development and innovation (RDI)

- Investment in applied research, through own projects or in a consortium, aiming at product and process innovation.

  Example:
  Mobilising Agendas.

Biodiversity Conservation

Within the properties under our management in mainland Portugal, we manage forest areas considered Areas of Interest for Conservation (AIC), which serve as an important habitat for assorted flora and fauna – including species with different conservation and protection and endemic statuses – and, as such, these areas are managed only with conservation objectives. Within these areas, High Conservation Value Areas (HCVA), a unique concept of FSC certification, are the most relevant due to the presence of exceptional environmental, social and cultural values, which are thus safeguarded.

The approach to biodiversity does not occur in Special Conservation Areas (SCA). This transversal work takes place in all properties, defining in each afforestation/reforestation project, from the outset, which conservation areas should be protected.

Hence, since 2008, we have followed a programmed strategy for the conservation and promotion of biodiversity, to reconcile production objectives with conservation, also responding to the indicators of forest certification. We have developed a strategy with a view to maintaining no net loss, *i.e.*, there will be no loss of biodiversity as a result of our activities – or improving, whenever possible, generating gains – **net positive gain** – for the existing biodiversity in properties with conservation status.

Good management practices are applied in the Company's activities, based on the Habitats and Birds Directives and the National Network of Protected Areas guidelines to protect or improve the conservation status of habitats and species with relevant conservation status.

We continuously invest in **monitoring and assessment, protection and active conservation actions** – such as the **re-qualification and renovation of natural habitats and ecosystems** – for the benefit of species that rely on them to fulfil their ecological functions of feeding, seeking shelter, or reproducing. They also serve as ecological corridors, assisting the natural spread of species and the genetic exchange between populations.

To support the conservation strategy, we developed **Manuals for Biodiversity Assessment Techniques** (MTAB) and monitoring and conservation field reports – **Conservation Action Plans** (CAP), developed with the input of experts. Under this approach, we compile a significant dataset on key values to be preserved in the region, and identify, prevent, mitigate, and minimise negative impacts (direct or indirect) on biodiversity, also enhancing positive impacts.

It is worth mentioning that we are one of the initial signatories of the **act4nature Portugal** initiative, promoted by BCSD Portugal, of which we are Advisory Board members. Created in 2020, this initiative aims to mobilise and encourage companies to protect, promote and restore biodiversity and ecosystem services, contributing to stopping and reversing its loss by 2030, leading to a better integration of natural capital into companies' business models and value chains.

See the visit of the Wildlife Conservation Society (WCS) to forest properties managed by the Company, to present how we promote and engage in the conservation of biodiversity in mainland Portugal, continuing the exchange of experiences that started in Mozambique, discussing lessons learned and approaches to improve current processes, within the scope of the COMBO+ Program (Chap. 5.2.4).

Sustainable forest management

We are aware of the **environmental and socioeconomic impacts** of our activities. Despite the impacts of forest plantations with predominance of a given species on the environment, like any other human activity, there is a growing recognition that a responsible and balanced management of planted forests, such as that ongoing at Navigator, can play a relevant role for the sustainability of the planet – through soil and water protection, air quality improvement, climate change mitigation[22] (Chap. 5.2.6), among others.

As for the surrounding Communities, negative impacts may occur as a result of operations on the ground, such as damage to public infrastructure resulting from the use of machinery and vehicles. However, we would like to highlight the important positive impacts generated by our activity, given that forests and forest-based products contribute positively to the economy and society and generate income for Owners, potentiating the forest and agropastoral management of other areas, and local economic activities associated with the forest, such as grazing and beekeeping.

Mindful of the importance of forest management and biodiversity conservation for our business and business model, we have defined three commitments in our 2030 Roadmap (Chap.3.4.4):

- Ensure the sustainability of land use and forest resources, including biodiversity. Our objectives include: help reduce wildfires in rural areas to ensure that the burned areas under Navigator's management are less than 1% per year; and creating a positive impact (or net gain) on biodiversity through conservation actions aligned with the Company's strategy and the commitments made under the act4nature Portugal initiative.

- Ensure that all wood comes from credible sources (FSC or PEFC certification schemes, or controlled origin). Our goals are: to promote chain of custody certification for all our Wood Suppliers by 2030; and to ensure that the Company's wood consumption incorporates at least 80% certified wood by 2030.

- Ensure a safe and healthy environment for Workers and their well-being, including the continuously offering OHS (Occupational Health and Safety) training courses on forestry activities for Service Providers, Suppliers and agents in the sector, seeking to carry out more than 600 annual hours training.

Our business model is essentially based on **sustainable forest management**, with a strong commitment to **certification**, prioritising the renewal and enhancement of the forest and the protection of natural, social and cultural values, and respect for the rights of Workers and local Communities along the **value chain**. To mitigate the negative effects of our operations, we systematically identify and assess the environmental and social impacts of forestry activities. This results in matrices which are used to plan and perform operations, thus avoiding negative impacts or acting accordingly when they occur. As part of this assessment, local consultations are also conducted with stakeholders, including the local community and/or experts on the various natural, social, and cultural aspects. The relevant Stakeholders can use communication channels to **remedy** the negative impacts of these operations, such as The Navigator Company's website and the Reporting Channel.

Such contacts can also be made face-to-face with our Employees, or via email or phone. In Mozambique, we would like to highlight the creation of Community Liaison Agents (Chap. 5.3.3). We base our work on **creating and sharing knowledge** and on establishing **partnerships** throughout the value chain—with forest owners and associations, business associations, suppliers, local authorities, and other community stakeholders.

We invest in **support programs** to promote sustainable and certified forest management, supporting **forest landowners** beyond the areas under our direct management. These programs focus on good practices, conservation of natural and sociocultural

[22] Sources: "Substitution Effects of Wood-based Products in Climate Change Mitigation" , Leskinen et. al, 2018, TIG Analysis. https://efi.int/sites/default/files/files/publication-bank/2019/efi_fstp_7_2018.pdf; FAO 2016. Forestry for a Low-Carbon Future: Integrating Forests and Wood Products into Climate Change Strategies, FAO Forestry Paper 177, Rome, Italy. https://researchrepository.murdoch.edu.au/id/eprint/66391/1/I5857E.pdf

values, and reinforce **prevention and defence against forest fires**, mitigating their significant impacts on ecosystems, the Group and our Stakeholders.

The responsible forest management we promote includes investment in **the conservation of biodiversity and ecosystem services**. Healthy ecosystems are key to well-being, health and job and wealth creation in Communities, ensuring that their needs are met. It is important to highlight the important supporting role that biodiversity plays in the balance of nature, making conservation an important ally in mitigating and adapting to the effects of climate change.

A clear proof of Navigator's active role to preserve natural values is the **dissemination and awareness actions** to share experiences and case studies in the group's own publications, projects, editorials or communication events covering different Stakeholder groups. Our work with agents in the forestry sector covers technical aspects related to the **knowledge transfer** on topics related to eucalyptus forestry, planning of forest operations, information management – geographic information systems (GIS), document and database – and decision making, as well as the dissemination of information on occupational safety and biodiversity conservation.

We have been recognised with an "A" rating by CDP Forests, as a leading company, reinforcing our commitment with the sustainable management of the forest.

Approach to sustainable forest management (includes biodiversity conservation)

- Forest certification and support to Forest Producers
- Forest firefighting prevention and support for fire-fighting
- Forest research and renewal
- Assessment and monitoring of natural and sociocultural values
- Mapping and classification of areas of interest for conservation
- Assessment of potential impacts of operations
- Definition and implementation of management actions for the conservation, enrichment or replacement of the functions of locations of interest for conservation
- Literacy projects for the forest and for the preservation of biodiversity

For Society: Grow

Responsible business conduct

Our operations and the behaviour standards meet our Stakeholder’s increasingly demanding criteria – both as regards internal relations and interactions with external Stakeholders. The key values that guide our performance – Trust, Integrity, Entrepreneurship, Innovation, Sustainability and Excellence – are at the heart of the **policies, codes and regulations** that ensure good practices linked to our activities and businesses.

To reinforce the Group and its Stakeholders' conduct, Navigator has a **Compliance System** aimed at ensuring compliance with the applicable legal requirements, in particular from the perspective of prevention of corruption; prevention of money laundering and terrorism financing; compliance with international sanctions; conflicts of interest; protection of Human Rights; and personal data protection.

It is worth mentioning that, on this issue, Navigator has a zero-tolerance policy towards violations of legal or regulatory rules in force.

To prevent and mitigate risks inherent in the relationships established with third parties, Navigator implemented a set of **Compliance Policies**, consisting of Third-Party Integrity Verification Policy, Compliance with International Sanctions Policy and an Anti-Money Laundering and Counter Terrorist Financing (AMLCTF).

These Policies define the principles underlying Navigator's operations in its relations with Investors, Employees, Suppliers, Customers and Partners, as well as the expressly prohibited conduct in the context of relations established within the scope of our operations. They also define measures to prevent these risks by following adequate due diligence procedures to assess the risk of criminal activities and the integrity of Navigator's counterparties.

See also our Code of Ethics and Conduct, Code of Conduct for Suppliers and the Code of good Conduct for Preventing and Combating Workplace Harassment.

To ensure the correct implementation of these instruments and promote a culture of Compliance based on ethical and integrated performance, Navigator holds training courses for its Employees on Compliance, namely regarding the **Code of Ethics and Conduct**, Internal Policies, Whistleblowing, Prevention of Corruption and Related Offences and Protections of Personal Data.

Sustainability related policies and codes

Social

- Human Rights Policy
- Major Accident Prevention Policy (applicable to Portugal)
- Community Engagement Policy (applicable to Mozambique)

Cross-sectional

- Management Systems Policy (applicable to Portugall)
- Pension Fund Responsible Investment Policys (applicable to Portugal)
- Risk Management Policy

Governance

- Code of Ethics and Conduct
- Corruption Prevention and Related Offences Policy
- Policy for Compliance with International Sanctions and Restrictive Measures
- Supplier Code of Conduct
- Code of Conduct to Prevent and Combat Harassment at Work
- Tax Policy
- Whistleblowing Regulation
- Remuneration Policy for Members of the Corporate Bodies of The Navigator Company (2023 to 2025) (applicable to Portugal)
- Personal Data Protection Policies
- Third-Party Integrity Verification Policy
- Policy for the Prevention of Money Laundering and Financing Terrorism
- Regulation on Conflicts of Interest and Transactions with Related Parties

Environmental

- Environmental Policy
- Forestry Policyl

We acknowledge the importance of Human Rights and align our practices with international references. Navigator is a signatory to the UN Global Compact and follows the UN Guiding Principles, ensuring practices that promote dignity, diversity, inclusion and safe working conditions. We are also signatories to the English and Portuguese versions of the **CEO's Guide on Human Rights**, published by WBCSD and BCSD Portugal, respectively, together with other companies at the international and national levels.

As a result of our commitments, we have a **Human Rights Policy** that takes measures to ensure that the Human and Labour Rights of all those who establish a relationship with the Navigator Group are respected.

Through our Policy, we also assume our commitment to due diligence on Human Rights, following the principles established in the International Charter of Human Rights, the OECD Guidelines for Multinational Enterprises, the Fundamental Conventions of the International Labour Organisation and the United Nations Guiding Principles on Business and Human Rights. Navigator's responsibility to respect Human Rights is also extended to the value chain, and the Company is increasingly demanding regarding the implementation of measures to ensure its adequate protection.

The Company acts to prevent negative impacts on the value chain and reinforces its commitments to equality, non-discrimination and respect for privacy.

Legitimate representation of interests

The Company acknowledges the importance of maintaining a transparent and responsible dialogue with policymakers and regulators, contributing to the development of public policies that promote sustainability, innovation, and competitiveness in the sector. We thus ensure that all initiatives pertaining to the legitimate representation of interests comply with the applicable legislation and the principles of integrity, transparency and corporate responsibility, reinforcing trust and credibility in its institutional relations.

We develop our Public Affairs performance in a strategic and cross-cutting manner, promoting articulation between business vision, political action and collective interest. It is, in practice, advocacy – legitimate, professional and substantiated –, aimed at monitoring, anticipating and influencing political, legislative and regulatory decisions with an impact on the Company's activity.

The core of the Public Affairs activity is the legitimate representation of our interests, that is, the reasoned defence of strategic positions with decision-makers. In the particular case of Navigator – Forest area –, this representation takes several forms: technical contributions to design public policies, participation in legislative consultations, meetings with policymakers, and articulation with sectoral associations and European entities.

As for 2025, we would like to highlight our contribution to the Forest Intervention Plan 2025-2050, presented by the Portuguese Government, under which we sought to defend solutions that value the production forest, in line with forest conservation forest, combat rural abandonment, encourage active, grouped and large-scale management, and acknowledge the essential role of the private sector in valuing the country's forest heritage, supporting forest producers and strengthening territorial cohesion.

At the European level, we follow, working together with Navigator's technical areas, the development of regulations such as the EUDR (European Union Deforestation Regulation), given their direct impact on our activity and the European forestry sector. Within the scope of CEPI (Confederation of European Paper Industries) and BusinessEurope (Confederation of European Business), we have explained the specific traits of our sector and worked towards to a more balanced approach, which takes into account the differences in context between countries and values companies that have adopted the best practices in forest management.

Navigator is registered in the EU Transparency Register (no. 609473539427-24) since 2020 and has subscribed to the relevant Code of Conduct.

Innovation, technology and R&D

We believe that scientific knowledge, people with talent and top qualifications, combined with innovation and technology, are promising conditions for a sustainable future. They are the pillar to develop bio-businesses and a new constellation of national industries motivated to make a difference by creating economic value in harmony with climate and nature.

Innovation and technology, strongly anchored in research and development (R&D), are pillars of Navigator's business and ensure the sustainability of its products and processes.

Creating Value with Accountability, the central concept of our 2030 Agenda (Chap. 3.4.2) means designing and implementing solutions to create sustainable value and competitiveness in the long term. Thus, in our 2030 Roadmap, we undertook to:

- Develop adaptive forestry practices from a climate change perspective;
- Develop innovative, competitive and sustainable products;
- Develop sustainable bioproducts, reducing dependence on fossil resources and promoting the decarbonisation of the economy.

Navigator is aware of the relevance of scientific and technological knowledge to its activities and established its own R&D centre: RAIZ - Forest and Paper Research Institute in 1996, a pioneering initiative in Portugal.

Science developed in Portuguese universities, in particular in the fields of biotechnology and bioeconomy, has been at the heart of lasting partnerships, which we deepen and enhance. The bet on collaborative work involves not only stakeholders in the national scientific and technological system but also international partners and key players in our sector.

In order to leverage our RDI activity, we participate in networks and consortia and submit applications to funds and external financing programs (national and international), in addition to our own investment in this field. Knowledge gathered from these activities has a tangible economic impact, leading to the development of innovative and distinctive products, as well as new technologies and services.

By securing external funding for R&D projects in collaboration with universities, we can ensure their commitment to the development of emerging technologies, particularly in stages requiring more fundamental research. This model, supported by RAIZ and Navigator, provides the necessary support for successful applications and ensures that the technology has a user base once it reaches greater maturity. We thus not only promote innovation and the creation of applied knowledge but also show that our policies are in line with Sustainalytics' criteria, namely the Commitment to support further research or engage with stakeholders on emerging technologies. This approach is a practical way of supporting research and consolidating our involvement to drive advances in areas such as nanotechnology, biotechnology and advanced processes assisted by artificial intelligence.

Supporting research work carried out by teams of researchers, technical experts and scholarship holders assists postgraduate training in Portugal and the creation of scientific employment. We encourage the creation of intellectual property and scientific publications in the fields of forests, pulp, paper and forest-based biorefineries. We also put our knowledge at the service of society through forest literacy programs (Chap. 5.3.3). Our funding policy provides a structured, solid foundation for the phased implementation of projects, offering a systematic approach to event hosting.

In this context, we promote partnership work, and the submission of funding applications to leverage the transition to a low-carbon economy and the bioeconomy, thereby enhancing our contribution in this regard.

We reinforced the digital transition and the adoption of Artificial Intelligence (AI) to boost efficiency, innovation and sustainability, developing more than 30 projects that integrate AI, machine learning and robotics, with an impact on cost reduction, process optimisation and production increase.

In 2025, Navigator's digital transformation has been consolidated through the implementation of a roadmap, reflecting a more efficient, safe and data-driven operation. This roadmap establishes clear priorities for the 2025-2028 period, focused on consolidating platforms, strengthening infrastructures and accelerating the adoption of advanced analytics and artificial intelligence.

In the industrial area, with the support of machine learning models, see the advances in the management of wood and chemical consumption, reduction of waste and compliance with quality parameters. Strategic projects include logistics management optimisation and implementation of Advanced Process Control (APC) in the pulp segment, improving quality, process stability and chemical consumption.

In the UWF segment, we developed Advanced Analytics models to control over-programming and whiteness variability, reducing consumption and waste. In the Tissue segment, we created a tool to optimise paper weight, minimising variability and fibre consumption. In the forestry field, we have advanced projects for better access to raw materials.

With a focus on Employees, we also bet on automation with GenAI, promoting task automation, risk mitigation and improvements in team productivity and motivation. See, for example, the Generative AI model with interactive ChatBot for 24/7 response to Employee questions, or the automation of environmental data processing and the adoption of centralised platforms for interaction with Customers and Suppliers.

The From Fossil to Forest Agenda led by Navigator, with a consortium of 27 Partners and the ambition to reach 11 Products, Processes and Services, was continued and focused on the development and industrialisation of cellulosic-based packaging. The Consortium’s activities are in full swing to achieve the objectives and targets set with the ultimate goal of positively impacting the Portuguese economy.

TransForm, an Agenda under the Recovery and Resilience Plan (RRP) and a coordinated initiative of the Portuguese forestry sector focused on digital transition, energy resilience and carbon neutrality, is ongoing with implementation of 28 projects. Navigator and RAIZ participate in 16 of these projects, covering areas such as genetic improvement, supply chain digitisation, electrical equipment, bio-fertiliser application, new waste recovery processes in the pulp and paper industry, the network of experimental forest plots, ecosystem services, as well as the development of geographic databases and applications for forest management. The Innovation Agenda is still under development.

See also the work developed at the Navigator Digital Test Bed, a test bed by Navigator, designed to accelerate the development, testing and validation of digital solutions applied to the forest, pulp, energy and paper industries, where we produce more than 40 prototypes combining technological experiments and its application in new contexts, further allowing for networking with national SMEs.

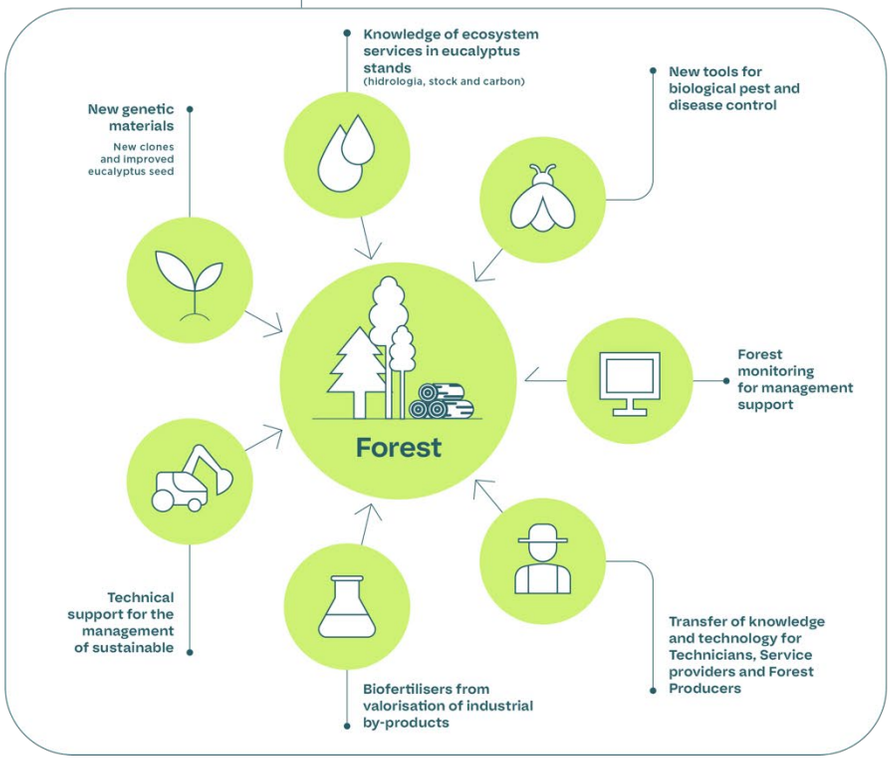
Vision

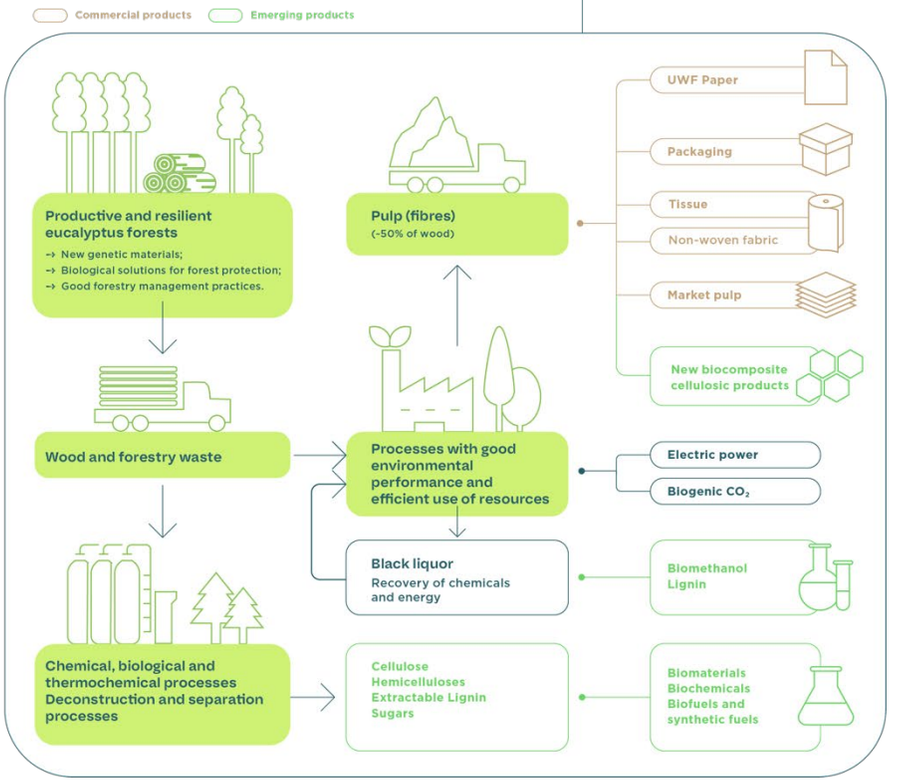
Efficient use of resources and the search for sustainable forest management through the development of scientific knowledge and state-of-the-art technologies of the art applied to eucalyptus genetics and forestry.

Strategy Research and innovation

Vision

Pulp and paper mills to evolve into biorefineries, integrally converting wood and biomass from sustainably managed eucalyptus-planted forests into paper products, energy, biomaterials, biochemicals, biofuels and synthetic fuels.





People, talent and human capital development

Human capital is a priority for Navigator, and we have been investing in it systematically to promote our Employees' development, growth and sense of fulfilment. Talent management is among our priorities and falls under the direct responsibility of The Navigator Company's CEO, whilst Human Resources fall under the responsibility of one Executive Committee member.

The strategic importance of the topic is related to the crucial role of our Employees in the Company – for the future and sustainability of the business –, and the number of jobs we ensure, as part of our social and economic impact on the local communities we operate in. Management of our Employees is based on the stability of employment relationships, recognition and appreciation of merit, internal growth and skills development throughout their careers, and investment in ensuring their safety, health and well-being (Chap. 5.3.1).

Under the 2030 Roadmap (Chap. 3.4.4), we define the following **commitments** within the scope of talent management and human capital development:

- Promote the development and empowerment of human capital, in alignment with the current and future needs of the Company;
- Contribute to the qualification and employability of young people in the regions we operate in;
- Promote an inclusive organisational culture capable of responding to internal and external challenges.

Within the scope of talent management, we also seek, wherever possible, to adjust and align practices in many geographies we operate in – already consolidated in relation to Mozambique. In the case of Ejea (Spain) and the United Kingdom, these are still in a transition stage, with policies and practices being aligned, following the acquisitions made in 2023 and 2024, respectively.

Talent management and human capital development

Recruitment and selection

- Focus on attracting and developing future generations of Navigator professionals and society.
- Promotion of continuous improvement of processes, in order to improve standards and experience of candidates participating in the recruitment and selection process.

Reception and integration

- Focus on accelerating the integration process with a view to the acquisition of skills essential for the exercise of the function and adapting to the Company's culture, creating a positive experience for all our Employees.

Performance and careers

- Performance and potential management and promotion of employee development, with robust and planned plans, in a logic of acquisition and development of skills and professional development.
- Preparation of succession plans, in order to ensure the development and appreciation of people, the continuity and the future of the business.

Skills development

- Promotion of the development of skills of Employees through the training offer provided by the Learning Centre.
- Implementation of development programs, in line with the Career Plan.

Compensation and benefits

- Development of compensation and benefits policies and programs, in compliance with applicable legislation and aligned with market practices.
- Implementation of salary structures and competitive benefit plans, with the objective of promoting internal equity, external competitiveness, and talent attraction and retention.
- Management of internal mobility processes.

Culture and communication

- Definition and implementation of the Internal Communication strategy.
- Management of the internal communication channels
- Support for strategic and business projects.
- Promote employee engagement and alignment with the company's culture, values and strategic priorities.
- Develop and execute the Employer Branding strategy.
- Contribute to talent attraction and retention.

Health, safety and well-being

Mindful of the fact that the risks associated with our operations include the possibility of occupational accidents and occupational diseases, we are firmly committed to our Employees' quality of life and invest continuously in creating a **safe and healthy environment** to ensure their well-being. Such incidents have the potential to affect not only the lives of our **Employees** and their families but also the company's competitiveness and reputation and may jeopardise the achievement of our strategic objectives.

It is therefore our responsibility to foster an **Occupational Health and Safety (OHS) culture** that, in a sustained manner, enables us to reduce the likelihood of such events and, in doing so, eliminate occupational accidents and diseases. By responsibly conducting business, we can, in addition to reducing costs for the Company, minimise risks to people, value chain workers, communities and the environment – in particular those resulting from the Company's industrial units and forestry operations – and help preserve our facilities and equipment.

Our 2030 Roadmap (Chap. 3.4.4) reflects the importance of this issue, through the **commitment** to ensure a safe and healthy environment for Workers ensuring their well-being, materialised in a number of objectives defined for Portugal:

- Achieve the target of "Zero Accident" Target through continuous improvement in safety, reaching a ≤2 frequency index in 2030 (Internal and external employees);
- Develop the Occupational Health program by 2030;
- Reduce the number of accidents mischaracterised for non-compliance with rules and procedures;
- Continuous training courses in Occupational Health and Safety in the forestry activity for Service Providers, Suppliers and agents in the sector.

As for Mozambique, since 2024, we have also had the objective of reducing the frequency index of occupational accidents.

Community relations

The Navigator Group has an important presence in several regions, through its industrial activity, in addition to a forestry-based operation in Portugal, Galicia (Spain) and Mozambique.

In line with our Purpose (Chap. 2.1), we assume the responsibility of creating mechanisms to share value with our Stakeholders (Chap. 3.4.5), with emphasis on the surrounding Communities. These play a major role in the relationship with companies, as they are the first link in the chain to receive the impacts, positive and negative, of our forestry and industrial operations (Chap. 5.3.3).

We take our social responsibility seriously, contributing to the progress and well-being of the Communities we operate in, in line with the Code of Ethics and Conduct. We have also endorsed and implemented a Human Rights Policy, expressing our commitment to respect the Human Rights of Local Communities, including, where applicable, indigenous peoples, and putting measures in place to minimise negative impacts and protect their values, culture and traditions. This Policy also establishes a commitment to promote the involvement of Communities and get feedback on Human Rights and labour rights, acknowledging the importance of their consultation and continuous dialogue to integrate their concerns into internal decision-making processes (Chap. 5.4.1

In this respect, see the creation of the **Whistleblowing Channel** (Chap. 5.4.1), available on the website and for any member of the affected Community, which results in the investigation of cases of Human Rights violation in Local Communities. It is worth mentioning that, during the reporting period, no cases of violations of these rights were identified.

Forests are our main source of resources, and one of our priorities is to promote knowledge about their benefits and the importance of the sustainable use of forest-based products for society. Within the scope of our 2030 Agenda and Roadmap, we are committed to **developing the relationship with Communities**, promoting knowledge transfer and public awareness of the economic, social and environmental relevance of forests (Chap. 5.2.6.)

Approach to the relationship with Communities

Dialogue with Communities

Forest literacy projects

Direct Community Support

Social Development Programme in Mozambique

Transfer of forestry management expertise and skills to Forestry Producers

We remain, therefore, committed to launching projects that help generate and share knowledge in the field of **forest literacy**, with an emphasis on the digital dimension, and **Stakeholder training** initiatives, such as forestry Producers (Chap. 5.2.6.). One target audience is school communities, whose early **awareness** of forest protection is of the utmost importance.

Supply chain management

We are aware of the impact our purchasing policies on the creation and distribution of value throughout the supply chain and we are committed to developing partnerships that foster positive change among the relevant companies and workers in it.

Our activity requires the **regular supply of timber, chemicals, packaging materials, among other products, as well as energy**, whose impacts result not only from its extraction and production, but also from its **transportation**.

The **logistic activity** of wood and biomass involves the movement of significant volumes of timber from forest areas, logistics parks and ports to factories, using several modes of transportation, namely road, rail and sea.

It is also worth mentioning **shipment of our products** to 117 countries and about 3 500 delivery points, using several means of transportation (maritime, rail and road), privileging partnerships with our Suppliers in the development of efficient solutions.

These activities generate relevant environmental and social impacts and ensure a resilient Supply chain capable of responding to our needs and the continuity and success of our business. Thus, we defined a set of **commitments** within the scope of our 2030 Roadmap (Chap. 3.4.4), e.g.:

- An increase in certified wood and promotion of chain-of-custody certification of all our wood Suppliers;
- Expand the range of Suppliers with assessments on financial and ESG criteria;
- Promote sustainability practices along the Suppliers Chain.

In order to strengthen a lasting and mutually beneficial relationship with our Suppliers of forest products and services, we created the **Navigator Forest Producers Club** initiative aimed at maximising forest productivity, promoting cost-efficiency and valuing the national forest. Through this programme, we are committed to training our staff, promoting the development and integration of human capital, and investing in equipment, thereby reinforcing an approach based on shared and sustainable growth.

Furthermore, we have a continuous collaborative relationship with the Suppliers of the remaining raw materials and services, promoting the adoption of the best environmental, social and governance practices. In 2025, we started using an ESG questionnaire for our Suppliers, aimed at gathering pertinent information for our operations, increase transparency throughout the value chain, and identify improvement opportunities to strengthen the sustainability of their operations.

Approach to Supplier management

Supplier Code of Conduct

- It covers topics such as anti-corruption and bribery practices, Prevention of Money Laundering and Financing of Terrorism, Respect and Promotion for Human Rights, Labour, Health and Safety Practices, as well as Environmental Practices.
- It is distributed to all materially relevant Suppliers, and in all market consultation processes.

Third Party Integrity Verification

- We have a Third Party Integrity Verification System and ensure its implementation, collecting information on Human Rights, prevention of corruption, money laundering and financing of terrorism, compliance with international sanctions, CO2 Emissions (scope 2 of the Supplier) and water management using a platform contracted for this purpose.

Payment via confirming

- Possibility for Suppliers to join the payment program via a confirming solution, anticipating payments and contributing to better treasury management, with the solution already implemented for most categories of Suppliers.

Engagement and outreach

- Participation in the Sustainability Forum.
- Organisation of Supplier's Day to strengthen the connection with the main Suppliers.
- Visits to our mills and nurseries.
- Promotion of projects to valorise eucalyptus forests and dissemination of our good forest practices.
- Other area-specific initiatives.

With the 2030 Agenda and given the way we address our material issues, we respond to the main sustainability challenges identified for Navigator (Chap. 3.4.2).

Navigator challenges

CHALLENGE	ASSOCIATED MATERIAL TOPICS	OUR RESPONSE
Protect and value biodiversity		
Biodiversity loss is one of the most pressing global crises today and is considered by the World Economic Forum (WEF) one of the most severe global risks over the 10-year horizon. The role of protecting, conserving and restoring nature and ecosystems is crucial to delivering benefits in terms of climate regulation, resource availability and other environmental and social services. With the growing acknowledgement of the importance of Nature to business, its dependence and impacts, new solutions and partnerships will emerge to halt the loss of biodiversity (aiming at the value chain), integrate the financial assessment of ecosystem services and promote nature-based solutions.	• Climate change • Responsible business conduct • Biodiversity conservation • Supply chain management • Sustainable management of forests • Innovation, technology and R&D • Resource use and circular economy	Sustainable management of own forests through certification by FSC and PEFC systems Support programs for forest producers and valorisation of eucalyptus forests Dissemination of good forestry practices through own channels and industry events Actions and means of preventing and supporting firefighting RDI activities and investment in bioproducts Forest renewal activities Forest literacy and biodiversity conservation projects Partnership building Commitment to conservation and monitoring actions we have committed to within the scope of the act4nature Portugal initiative Project "Knowing the Eucalyptus"
Climate mitigation and low-carbon economics		
Failures as regards climate action, mitigation and adaptation reiterates the need for greater commitment and action in this field. Weather events will become more frequent and severe, affecting locations and how people live and work, thus requiring a greater focus on adaptation strategies. Emerging global climate policy action and a more demanding regulatory framework in the European Union. The low-carbon economy is at the heart of current plans. The development of new technologies (e.g. carbon capture solutions) will be accelerated, jobs will be created, and new sources of energy (e.g. hydrogen) and new opportunities will be seized. After COP29 and with progress to COP30, carbon markets have become clearer and more functional, bolstering investor confidence. We need to keep innovating to avoid increased costs and ensure competitiveness during the energy transition.	• Climate change • Responsible business conduct • Biodiversity conservation • Water management • Supply chain management • Sustainable management of forests • Innovation, technology and R&D • Resource use and circular economy	• Company's decarbonisation roadmap and targets approved by SBTi - Science Based Targets initiative • Sustainable forest management • Investment in systems and technologies that minimise environmental impacts and promote improved energy efficiency • Gradual elimination of fossil energy consumption and investment in alternative and renewable energy sources (e.g. solar photovoltaic, biomass, green hydrogen) • Production of renewable energy • RDI activities and investment in bioproducts • Analysis of the positive contribution of our agroforestry heritage as a carbon sink • Alignment with the TCFD initiative and the European Taxonomy
Circular economy		

CHALLENGE	ASSOCIATED MATERIAL TOPICS	OUR RESPONSE
Regulatory developments and consumer pressure regarding sustainable production and consumption, resource scarcity, supply chain volatility and the imminent threat of climate change are driving companies to develop more circular business models that generate business value alongside environmental benefits. There is also a growing need to measure circularity using new tools, standards and frameworks.	• Climate change • Responsible business conduct • Biodiversity conservation • Water management • Supply chain management • Sustainable management of forests • Innovation, technology and R&D • Relationship with Communities • Resource use and circular economy	• Optimisation and improvement of industrial processes – efficiency in the use of resources, processes and treatment systems • Recovery of waste and reincorporation of by-products in Navigator's processes • Promotion of industrial symbiosis • RDI activities and investment in bioproducts • Partnership building • Participation in the Circular Bioeconomy Alliance platform • Valuing scientific and technological knowledge in circular and digital forest-based bioeconomy
Sustainable consumption		

Growing awareness, activism and demands from consumers, in particular younger generations. Demand for healthier and more sustainable products and solutions, openness to new consumption models – digital, changing from ownership to sharing.
 	
More conscious consumers demand greater transparency, clarity and traceability of information.
 	
Reinforcement of packaging production as an alternative to plastics (in particular, single-use plastics).
 	
Emphasis on the role of companies in raising consumer awareness and designing more sustainable and cost-competitive solutions.
	• Climate change
	• Responsible business conduct
	• Biodiversity conservation
	• Water management
	• Supply chain management
	• Sustainable management of forests
	• Innovation, technology and R&D
	• Relationship with Communities
	• Resource use and circular economy
		• Products with forest certification label and/or EU Ecolabel
		• RDI activities and investment in bioproducts
		• Packaging products from the gKRAFT range reinforcing the transition to more sustainable solutions
		• Innovative tissue products:
		  ○ Amoos Naturally Soft™ (unbleached eucalyptus kraft paste)
		  ○ Amoos Aquactive™ (produces soap scum when moistened)
		  ○ Amoos Air sense™ (with floral fragrance capsules)
		  ○ Amoos Calorie Control™ (greater absorption capacity of dietary oils and fats)
		• Forest literacy projects
		• Suppliers' Day
		• Customer Events – Navigator on the bright side of the future

Technology for the Common Good		
Technological evolution and digitisation keep changing work, interaction and trade models. This advance poses challenges regarding equal access to digital and the management of the risks associated with new technologies. Acceleration of digital transformation to increase business resilience and sustainability performance, creating solutions to some social and environmental problems. Funding opportunities for companies to leverage the technological revolution, enabling them to invest in decarbonisation, the bioeconomy, mobility and the digitisation of their processes and ways of working.	• Climate change • Responsible business conduct • Biodiversity conservation • Water management • Supply chain management • Sustainable management of forests • Innovation, technology and R&D • People, talent and human capital development • Resource use and circular economy	• Creation of the Digital Technology Department, which integrates covering themes Industry 4.0 and digital transformation issues in all operational areas • Investment in systems and technologies to minimise environmental impacts and promote improved energy efficiency • RDI activities and investment in bioproducts • Packaging products from the gKRAFT range • Innovative tissue products • Digital Forum
Future of work		
Continued advances in robotics, artificial intelligence, and machine learning are ushering in a new era of automation as machines match or exceed human performance in several work activities. Discussion around people's adaptation to this new era, the jobs and	• Responsible business conduct • Supply chain management • Innovation, technology and R&D • People, talent and human capital	• Mapping internal successions to ensure the sustainability of several functions in the future • Employee development plans • Flexibility of the remote working model (partial regime)

CHALLENGE	ASSOCIATED MATERIAL TOPICS	OUR RESPONSE
skills of the future. The acceleration of digitisation has increased the need to re-skill and prepare human capital for new roles and work processes. Sustainability is increasingly valued by applicants and companies, hence the need to invest in the development of "green skills".	development • Health, safety, and well-being	• Investment in training and in the offer of the Learning Centre • Bet on creating digital skills • Mobilisation of Employees around the Company's purpose • Promotion of employability and attraction of young talent • Digital Forum
Investment in human capital		
People remain one of the main assets of companies. The "S" factor of ESG is ever more relevant, with a greater focus on the well-being, health and safety of Employees. At the same time, new ways of working and relationships between companies and employees were consolidated, including more flexible models, remote work and greater integration between professional and personal life. To retain and engage Employees, companies need to foster a stronger link between work and purpose, promote growth and development opportunities, and create work models and more diverse and inclusive environments, in particular, to motivate younger generations. Sustainability is increasingly important to employees and job applicants, hence the importance of communicating the company's ESG strategy and impact. Greater attention on the part of companies, but also investors and financial institutions, to detailed information on human capital.	• Responsible business conduct • Supply chain management • People, talent and human capital • development • Relationship with Communities • Health, safety, and well-being	• Promotion of professional development and career conditions for Employees • Creating custom development plans • Investment in training and the Learning Centre • Promotion of new leaders and their training • Fostering the spirit of entrepreneurship • Improvement of remuneration conditions and bonus awards • Benefit schemes and retirement fund • Mobilisation of Employees around the Company's purpose • Promotion of employability and attraction of young talent • Means and resources to create safe working conditions • Occupational health and preventive medicine programs • Mission Zero • Future Leaders Forum • "CRESCER" (Growing) Project • Labour Forum • Digital Forum
Resilient and sustainable value chains		
The volatility of raw material prices and the impacts of trade wars have put the resilience of value chains to the test and reinforced the urgency of analysing their sustainability. The context was marked by difficulties in importing raw materials and exporting products, resulting from successive disruptions in supply chains (including strikes, supply failures, and protectionist policies, among others). Stakeholders keep putting pressure on companies to better manage their Supply chains, with special focus on respect for Human Rights and the environment. Greater maturity of programs and initiatives implemented by companies, greater transparency and better assessment of the performance of the Supply chain in terms of sustainability are expected. Transition from soft law to hard law, with increasingly demanding regulatory frameworks and accountability of companies for their	• Climate change • Responsible business conduct • Biodiversity conservation • Water management • Supply chain management • Sustainable management of forests • Relationship with Communities • Health, safety, and well-being • Resource use and circular economy	• Supplier Code of Conduct • Partnership strategy with Suppliers (e.g. increase energy, resource and transportation efficiency; seek alternatives to fossil energy and contribute to decarbonisation goals) • Sustainable management of own forests through certification by FSC and PEFC systems • Promotion of chain of custody certification for all our Wood Suppliers • Support programs for forest producers and valorisation of eucalyptus forests (e.g., Forest Producers Club) • Dissemination of good forestry practices through own channels and industry events • Eligibility criteria for the supply of raw materials • Optimisation of timber inbound flows • Partnership with raw material suppliers to encourage the production of energy from biomass • Bet on alternatives to road transportation (e.g. rail and sea) • Payment by confirming to Suppliers (applicable only to some categories

CHALLENGE	ASSOCIATED MATERIAL TOPICS	OUR RESPONSE
impacts on the value chain.		of Suppliers) • Suppliers' Day • Navigator Forest Producers Club • Customer Event – Navigator on the Bright side of the future
Protecting fundamental rights		
The responses of companies to movements such as #InclusionMatters, #MentalHealthMatters and #RepresentationMatters have increased the focus on human capital. Companies are being scrutinised by several Stakeholders, regarding issues such as lack of equity, racism, harassment or other discriminatory practices. Expectations regarding respect for Human Rights and labour rights are extended to the value chains, in light of recent regulatory developments (transition from soft law to hard law). More than guaranteeing the social licence to operate, companies have to build bonds of trust and create social value with Employees and Communities, and have an active voice and act against injustices. Diversity is emerging as a competitive advantage and will lead to a reassessment and expansion of diversity, equity and inclusion programmes and practices. Increased interest from funds in social and governance matters for ESG investments.	• Responsible business conduct • Supply chain management • People, talent and human capital development • Relationship with Communities • Health, safety, and well-being	• Responsible business conduct, based on ethics, responsibility and transparency • Codes of Ethics and Conduct for Employees and Suppliers • Human Rights Policy • Equality plan • DEI Diagnosis Project • Reporting Hotline • Fair, safe and fair working conditions that promote the health, well-being and development of Employees • Collective bargaining instruments • Investment in training • Labour Forum • UN Global Compact Membership
Participation in the adaptation of the regulatory framework		
Regulation creates stable, predictable and fair conditions businesses depend on to invest, compete and thrive. Businesses should support the design of policies that encourage sustainable transformation. Business must adjust to new European regulations and new ways of driving global change. Challenges such as climate action, diversity, equity and inclusion, human rights, and the fight against greenwashing, among others, are subject to increasingly stringent standards, and companies, by working in partnership, will play a key role in this process. Given the evolving regulatory frameworks, companies are expected to be more transparent, using their advantage to shape policies, regulations, and standards to address long-term sustainability challenges.	• Climate change • Responsible business conduct • Biodiversity conservation • Supply chain management • Sustainable management of forests • Resource use and circular economy	• Monitoring the most pressing issues on the political agenda in Europe, Portugal and Mozambique • Carrying out advocacy initiatives by the Public Affairs Department, inserted in the regulatory, environmental and social spheres • Collaboration in studies and issuance of technical opinions • Participation in industry associations and events, national and international • Organisation of events, visits and debates around structuring themes for the Company and the sector • Business Round Table

CHALLENGE	ASSOCIATED MATERIAL TOPICS	OUR RESPONSE
Stakeholder Capitalism		
Stakeholder Capitalism emphasises the importance of meeting the needs of several Stakeholders of companies, as opposed to a model where short-term profit maximisation prevails for Shareholders. It is based on the creation of long-term shared value, considering not only Shareholders but also Customers, Employees, Communities and Suppliers, among others. Business models are rethought to respond to societal and market pressures, and there will be a growing need to apply new metrics for impact assessment. Businesses must drive the reinvention of capitalism to ensure that the power of private enterprise and competitive markets can be harnessed to support long-term social, environmental and business prosperity.	• Responsible business conduct • Supply chain management • People, talent and human capital development • Relationship with Communities • Health, safety, and well-being	• Navigator Purpose • Responsible Business Agenda 2030 • Sustainability governance structure with involvement of external stakeholders (Sustainability Forum, Environmental Council and Community Monitoring Committees) • Mechanisms for communicating and engaging with Stakeholders • Financing sustainable development • Share value with Stakeholders • Responsible business conduct, based on ethics, responsibility and transparency • Reporting and internal reflection around WEF's Stakeholder Capitalism metrics • UN Global Compact Membership • Project "Knowing the Eucalyptus"

3.4.3. Contribution to the SDG

We are committed to playing an active role in implementing the United Nations 2030 Agenda, making the Sustainable Development Goals (SDG) a tangible reality. The update of our 2030 Agenda and Roadmap reflects the results of the double materiality analysis (Chap. 5.1) and the reassessment of our contribution to the SDG and their targets, ensuring that all our commitments are aligned with these global priorities (Chap. 3.4.4). We thus ensure that each initiative and action promoted by the Company is targeted to maximise positive impact and make a concrete contribution to the 2030 Agenda.

We acknowledge the level of impact and influence of The Navigator Company in meeting the SDG and structured our contribution in three categories:

Core*:* Strategically relevant to the Group – show the strong connection between its business activities and the areas where it can have a positive impact.

Supportive: Direct or indirect contributions resulting from the Group's approach to sustainability, in particular actions/programmes still gaining traction internally/externally and/or resulting from support programmes to core Group activities.

Local: Direct or indirect contributions resulting from the approach to sustainability by individual Group companies, aligned with the local context of the geographies where operate in, and arising from the contributions mapped in the core and supportive SDG. In this context, see the contributions of the Social Development Program developed by Portucel Mozambique.

The table below sets out the SDG and their respective targets Navigator contributes to, as well as the material issues most directly associated with them. In the 2030 Roadmap (Chap. 3.4.4) there is also a clear match between the commitments made by the Company and the SDG that, through the established objectives and goals, are addressed.

CORE SDG

8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	15 LIFE ON LAND
Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.	**Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.**	**Ensure sustainable consumption and production patterns.**	**Take urgent action to combat climate change and its impacts.**	**Protect, restore and promote sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification, and halt and reverse land degradation and stop biodiversity loss.**
Targets **8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, 8.8**	**Targets** **9.1, 9.2, 9.4 and 9.5**	**Targets** **12.2, 12.4, 12.5, 12.6 and 12.8**	**Targets** **13.1, 13.2 and 13.3**	**Targets** **15.1, 15.2, 15.3, 15.5 and 15.8**
OUR CONTRIBUTION				
Contribution to Portugal's per capita economic growth. Creating a fairer, healthier and safer workplace for all employees. Close relationship with local Suppliers and Producers, strengthening the local economy and the resilience of Communities. Technological modernisation and innovation. Investment in the efficient use of resources, innovation and technology. **Related material topics** Responsible business conduct; Supply chain management; Innovation, technology and R&D; People, Talent and Human capital Development; Health, Safety, and Wellbeing; Resource use and circular economy.	Strengthening scientific research and improving technological skills. Investment in innovative forest-based solutions and products, and improvement of forestry practices, for the promotion of a circular and low fossil carbon bioeconomy Promotion of collaborative work with Partners. Developing sustainable bioproducts, reducing dependence on fossil resources and promoting the decarbonisation of the economy. Promotion of the improvement of infrastructures, including health infrastructures and schools in Mozambique, under the Social Development Program. **Related material topics** Climate Change; Innovation, Technology and R&D; Relationship with Communities; Resource use and circular economy .	Investment in the best available technologies and solutions to minimise environmental impacts – e.g. renewable energy, efficient and circular use of resources, reduction of water use and recovery of waste. Promotion of the circular economy through efficient use of resources, process optimisation, management of treatment systems (water and waste) and promotion of industrial synergies. Selective collection of waste, correct packaging and forwarding to an appropriate final destination, privileging recovery operations, whenever possible. Sustainable production, products of differentiating quality and manufactured from renewable raw materials, responding to consumer expectations. **Related material topics** Climate Change; Responsible Business Conduct; Innovation, Technology and R&D; Resource use and circular economy.	Assessment of the actual and potential impacts and climate-related risks and opportunities on our business, strategy and financial planning. Promoting the resilience of forests and their important carbon sequestration function. Commitment to reduce scope 1 and 2 GHG emissions by 63% by 2035, by reference to 2020, and scope 3 GHG emissions by 37.5% (targets approved by SBTi). Investment in renewable energy sources, such as biomass and solar energy. Contribution to the debate on policies, strategies, plans and measures to combat climate change, at the national and international levels. Developments of climate action-oriented educational and awareness-raising programmes. **Related material topics** Climate change; Responsible business conduct; Biodiversity conservation;	Management of a vast forest area in mainland Portugal, 100% certified by the FSC and PEFC systems, and promotion of management practices that counteract factors of deforestation, forest degradation and/or conversion of natural ecosystems. Check origin of the wood purchased. Practices that promote long-term productivity and resilience. Ecological restoration, conservation of protected soils and agroforestry habitats, and conversion of inadequately produced forests and reforestation with native species; eradication of invasive species. Combating desertification and reducing erosion through the dissemination of good conservation agriculture practices, community environmental awareness. Annual monitoring of biodiversity and ecosystem services, assessment and mitigation of impacts of forest operations. Technical support programs for forest producers (e.g. e-globulus

	Sustainable management of the forest; Innovation, technology and R&D; Resource use and circular economy.	platform and Navigator Forest Producers Club). Collaboration with Academia in an impact assessment project for Forest Certification in Eucalyptus Plantations. **Related material topics** Responsible business conduct; Sustainable management of the forest; Biodiversity conservation; Resource use and circular economy.

SUPPORTIVE SDG

Ensure healthy lives and promote well-being for all at all ages.	**Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.**	**Achieve gender equality and empower all women and girls.**	**Ensure availability and sustainable management of water and sanitation for all.**
Targets **3.3, 3.4, 3.8 and 3.9**	**Targets** **4.3, 4.4, 4.6 and 4.7**	**Targets** **5.1, 5.4 and 5.5**	**Targets** **6.1, 6.3, 6.4, 6.5, 6.6 and 6.8**
OUR CONTRIBUTION			
Prevention and monitoring of the health of Employees through the Occupational Health Program in Portugal and the Preventive Medicine Program in Mozambique. Contribution to physical, mental and social well-being through the Occupational Health Program, which includes psychological consultations, social work, among others. Early identification of diseases, counselling regarding treatment, and recommendations for better health through the Preventive Medicine Program. Improvement of the health and well-being of communities in Mozambique through the Social Development Program, promoting quality of water for human consumption and investment in health infrastructures, namely the operating room of the Ile Hospital. Risk assessment and monitoring of physical, biological, chemical and ionising radiation agents in industrial units. Occupational accident prevention program. **Related material topics** Responsible business conduct; Relationship with Communities; Health, safety, and well-being	Improvement of qualification and employability, namely of young people, in the regions we operate in. Attraction and development of young people through professional internships. Social and family support to Employees through the granting of scholarships. Development of specific educational programs, such as: • Floresta do Saber • Dá a Mão à Floresta • My Planet • Florestas.pt • Biodiversidade.com.pt • Navigator Forest Producers Club • Forest Producers • The e-globulus platform Promotion of equal access and development of skills of Employees through the training offer provided by the Learning Centre, and availability of access to some of the program contents to their families. **Related material topics** Responsible business conduct; Supply chain management; People, talent and human capital development; Relationship with Communities.	Implementation of the Equality Plan and the Diversity, Equity and Inclusion Governance Model. Creation of internal conditions to increase the representation of women in leadership positions. Gender study in the wood processing sector in Mozambique, with ILO involvement, to identify employment opportunities and decent work for women in companies in this sector. **Related material topics** Responsible business conduct; Supply chain management; People, talent and human capital development; Relationship with Communities; Health, safety, and well-being	Development of the Water Use Reduction Program (WURP). Investment in technologies to reduce water consumption, such as water reuse and effluent treatment systems. Development of R&D activities with regard to forestry practices aimed at conserving water in the soil and finding solutions – genetic materials and practices – to increase resilience to water scarcity. Monitoring water quality through a protocol developed by Portucel Mozambique, in partnership with RAIZ (from an operational perspective). Development of a plan for opening and repairing boreholes, allowing access to drinking water to several communities we operate in, under the Mozambique Social Development Program; testing the quality of water for human consumption, thereby ensuring access to drinking water for a large number of families. **Related material topics** Water management; Innovation, technology and R&D; Relationship with Communities.

LOCAL SDG

End poverty in all its forms everywhere	**End hunger, achieve food security, improve nutrition and promote sustainable agriculture**	**Reduce inequality within and among countries.**
Target **1.5**	**Targets** **2.3, 2.4 and 2.5**	**Target** **10.1, 10.2, 10.3 and 10.4**
Contribution to improving the income of vulnerable communities in Mozambique and promotion of technical training for the professionalisation of the labour market. Combating the poverty of local communities through local hiring and encouraging beekeeping as a source of income, under the Social Development Program. **Related material topics** People, talent and human capital development; Relationship with Communities.	Improvement of food security and diversity, as well as sustainable agricultural production and practices, through agricultural extension (improved seeds, conservation agriculture techniques); barns (minimising post-harvest losses); school vegetable garden program and community environmental awareness program, under the Portucel Mozambique Social Development Program. **Related material topics** Relationship with Communities.	Portucel Mozambique's contribution to increasing the income and improving the well-being of the most disadvantaged sections of the population, through its Social Development Programme and through the jobs created by its operations, focused on rural areas where the population is most vulnerable and has the least access to basic infrastructure. Promotion of wage equity between genders, based on fair wages for equal work or work of equal value. Implementation of the Tax Policy with a significant impact on the business fabric, affecting the Group's entire value chain. **Related material topics** Responsible business conduct; Supply Chain Management; People, talent and human capital development; Relationship with Communities.

3.4.4. Roadmap

The **2030 Roadmap** presents the state of play of Navigator's performance in relation to each objective – Status – and the respective link to the contents of the report. See also the new objectives and intermediate targets defined for the next annual cycle.

This roadmap presents the link between the commitments of the 2030 Responsible Management Agenda and the targets of the SDG of the United Nations 2030 Agenda.

The following key should be considered:

In progress, can be brought forward

In progress, as planned

In progress, with downward tendency, reflecting performance of the past two years

Strategic action area **for Society**

Strategic action area **for the Climate and Nature**

Commitment	Objectives	Base Value	Target	Performance in 2023	Performance in 2024	Performance in 2025	Status
Ensure that investment and sustainable finance policies incorporate ESG criteria Core SDG 8.2 9.4 12.6 Supportive SDG 16.6	Achieve an ESG finance ratio of 70% or more by 2030 2023-------- to 2030 Base year Target year	----------	≥ 70%	Goal defined in 2023	66%	90%	
	Ensure that the Net Debt/EBITDA ratio remains below 2.0x (continuous) 2023-------- to 2030 Base year Target year	----------	< 2.0x	Goal defined in 2023	1.12	1.87	
	Continue the ESG investment policy regarding Pension Fund asset management, to ensure that investments follow a sustainable and responsible approach, in addition to the traditional financial criteria (continuous) 2023-------- to 2030 Base year Target year	----------	---------	Goal defined in 2023	The principles of sustainable investment were continued, as mandated to the fund managers. These principles include exclusion criteria for investments that do not meet ESG standards.	We maintained the principles of sustainable investment, as mandated to the managers. These principles include exclusion criteria for investments that do not meet ESG standards.	
Engage with national, international and local Community institutional Stakeholders, listening to their expectations and	Hold 8 meetings annually of the Community Monitoring Committees, in the surroundings of the industrial units of Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão 2022------- to 2030 Base year Target year	3 meetings of the Community Monitoring Committees	8 meetings of the Community Monitoring Committees, annually	8 meetings of the Community Monitoring Committees	8 meetings of the Community Monitoring Committees	7 meetings of the Community Monitoring Committees	

aligning them with Navigator's strategy and needs Core SDG 9.1 12.8 15.1, 15.2 Supportive SDG 4.7 11.3, 11.6 17.16, 17.17	Engage, annually, in 30 to 40 interactions with representatives of relevant Stakeholder groups, at the national and/or European level 2022------- to 2030 Base year Target year	10 interactions	Between 30 and 40 interactions annually	More than 10 interactions with national and European members of parliament	54 interactions (national and international)	108 interactions (national and international)
Expand the range of suppliers with assessments on ESG criteria Core SDG 8.4, 8.7 12.2, 12.6 13.1, 13.3 15.2 Supportive SDG 6.4 17.16	Promote the financial evaluation of materially relevant Suppliers, on an annual basis, to ensure the sustainability of supply to Navigator 2023-------- to 2030 Base year Target year	----------	100% of materially relevant suppliers[23]	Goal defined in 2023	100% of materially relevant suppliers assessed	100% of materially relevant suppliers assessed
	ESG performance assessment (decarbonisation, water management and respect for human rights) for materially relevant suppliers by 2025 -100% for chemical and packaging suppliers -80% for logistics and transportation suppliers 2023------ to 2025 Base year Target year	----------	100% for chemical and packaging suppliers 80% for logistics and transportation suppliers	Goal defined in 2023	100% of materially relevant chemical and packaging suppliers assessed 100% of materially relevant logistics and transportation suppliers assessed	100% of materially relevant chemical and packaging suppliers assessed 100% of materially relevant logistics and transportation suppliers assessed[24]
Promote sustainability practices along the Suppliers Chain	100% of materially relevant new contracts covered by Navigator's Supplier Code of Conduct by 2026 2023-------- to 2030 Base year Target year	Logistics and transportation suppliers: 0% Wood suppliers: 0% Chemical and packaging suppliers: 100%	100%	----------	100%	100% of new contracts

[23]Materially relevant suppliers of chemicals and packaging - representing about 80% of the total volume of purchases (*spend*).

Materially relevant logistics and transportation suppliers - representing about 80% of the volume (in number).

Materially relevant suppliers of wood - representing about 80% of the volume of wood supplied (m^3)

[24]The evaluation, resulting from Moody's ESG rating, is carried out annually. However, the integration into the supplier evaluation model and subsequent communication to partners is completed by the end of the 1st quarter of each year.

	Define a program to support the development of decarbonisation plans, water management and respect for the human rights of our suppliers by 2026 2023-------- to 2026 Base year Target year	----------	N/A	Goal defined in 2023	Logistics and transportation suppliers: For 2024, it was not possible to develop a plan. It will be a target for 2026 Wood suppliers: In 2024, a decarbonisation plan was drawn up by 2033, under the scope 3 of the European Union	Logistics and transportation suppliers: It will be a goal for 2027 Wood suppliers: Implementation of the decarbonisation plan	—
	Promote partnerships for the use of more sustainable means of transport (own and suppliers) by 2026 2023-------- to 2026 Base year Target year	----------	----------	Goal defined in 2023	Logistics and transportation suppliers: Consolidation of the maritime service to central/northern France with Wec Lines, increasing shipments by sea to the detriment of road, resulting in an emission reduction of about – 786 t CO_2 in 2024 (face as is) Wood suppliers: Elaborated on a decarbonisation plan for the area that includes the establishment of partnerships	Logistics and transportation suppliers: Consolidation of the maritime service to central/northern France with Wec Lines, developing deliveries by sea, to the detriment of road, resulting in an emission reduction of about 600 t cO_2 in 2025 Wood suppliers: Implementation of the decarbonisation plan	✓
Promote development and upskilling of human capital in line with the Company's present and future needs 	Cover 80% of Employees with individual development plans (IDPs) customised to their professional needs and projects, in line with Navigator's succession needs, by 2030 2023-------- to 2026 Base year Target year	----------	80% **Intermediate targets:** 45% of the total number of Employees with a Development Plan in 2026 2021------- to 2026 Base year Target year 60% of Technicians / Experts /Managers with a Development Plan in 2026 2022------- to 2026 Base year Target year	26% of the total number of Employees with an Individual Development Plan 38% of Technicians/Experts/Managers with an Individual Development Plan	31% of the total number of Employees with an Individual Development Plan 53% of Technicians / Specialists / Managers with an Individual Development Plan	36% of the total number of Employees with an IDP 66% of Technicians / Specialists / Managers with an IDP	✓
	Create awareness in the teams about good practices and ESG sustainability commitments by 2026 2023-------- to 2026 Base year Target year	----------	80% **Intermediate targets:** Conduct periodic awareness actions and offer training to 80% of employees by 2026 2022------- to 2026 Base year Target year	Goal defined in 2023	The S-pertise Program was created, and the Sustainability and ESG training syllabus, starting in 2025, was structured. The internal Sustainability Hub platform was launched with sustainability content for employees	Dissemination of Sustainability Highlights and preparation of the sustainability training syllabus.	✓

Contribute to the skills and employability of young people in the regions where we operate Core SDG 8.5, 8.7 Supportive SDG 4.3, 4.4, 4.7 17.16, 17.17 Local SDG 10.2	Establishing partnerships with educational institutions in all regions where we operate in the national territory (universities and technical schools) along with internship programs, assisting the development of skills and employability for young people. 2020------- to 2030 Base year Target year	----------	**Intermediate targets:** - Integrate 20% of the professional internships directed to Staff Members 2021----- to 2025 Base year Target year - Integrate 50% of the professional internships of Operational Technical Experts 2021----- to 2025 Base year Target year	• Participation in 26 initiatives at universities (fairs, pitches and presentations) • 31 curricular internships/dissertation projects • 3 open sessions for master's degree final year students at the Faculty of Science and Technology of the University of Coimbra, NOVA FCT and Universidade Autónoma • 8 scholarships awarded • 23 student-group visits to Navigator factories (636 students) • 109 professional internships, of which: · 51 professional internships for graduates and master's, with integration of 27.4% of these in the company's staff · 58 professional internships for future operators, with integration of 67.2% of these as operational technical experts • About 50% integration of professional internships • 3 long-term trainees (24-month program) • 48 summer internships	**No. of actions in universities and technical schools** Average execution of the plan above 90%: 100% in 2024 (considering only the number of job fairs) **No. of internship programs** Execution of the internship plan in 2024 80.85%: **291 Internships** 172 professional internships: • 47 professional internships for graduates and masters (27%) • 125 professional internships of operational Technical experts (73%);	**No. of actions in universities and technical schools** Average execution of the plan above 90%: 100%, in 2025 (considering only the number of job fairs). **No. of internship programs** Execution of the internship plan in 2025: 88% **Internships** (summer, professionals for graduates and masters and operators course) • 134 professional internships/operators course: • 67 professional internships for graduates and master degrees students (50%); • 67 operator courses (50%).	
Promote an inclusive organisational culture able to integrate internal and external challenges Core SDG 8.5, 8.8 Supportive SDG 17.16 Local SDG 10.3, 10.4	Continuously monitor the main motivational stimuli of Employees to achieve a better adaptation of the management practices, policies and processes implemented 2020------- to 2030 Base year Target year	----------	CRESCER: 100% implementation of the roadmap in 2030. Climate Survey: Average >70% in indicators related to satisfaction and engagement in the climate study.	The Straight To The Top Program covered 4 industrial complexes, with the following results: -35 ideas submitted; -1 awarded idea. The organisational climate survey achieved a 73% participation rate (the highest among all surveys conducted at Navigator).	CRESCER, a cross-cutting project of evolution of organisational culture Climate Study - Average result of indicators related to satisfaction and engagement: 65.4 (2023), 69 Open Days in 2024 -34 in the 1st semester and 35 in the 2nd semester	CRESCER - 69% implementation of the initiative roadmap suggested by Employees. After the 2024 revamp, we held 43 Open Days in 2025 - 31 in the 1st semester and 12 in the 2nd semester.	

Provide a safe and healthy environment for Employees, ensuring their well-being Core SDG 8.5, 8.8 Supportive SDG 3.8, 3.9	Develop the Occupational Health program by 2030: - Work Ability Index (WAI): 45% in 2030 - Assessment of Employee satisfaction with the program: >95% 2020------- to 2030 Base year Target year	40.04%	45% >95%	Since the monitoring of this index is carried out every 4 years, the revaluation of the WCI will take place in 2025 97%	Since the monitoring of this index is carried out every 4 years, the revaluation of the WCI will take place in 2025 97%	ICT: 40.2% Assessment of Employee satisfaction with the program: 98%	
	< 10% of accidents — reclassified due to non-compliance with rules and procedures 2022------- to 2030 Base year Target year	49%	<10%	-------	19%	28%	
	Develop the Ergonomics Action Area: 100 workstations redesigned by 2030 2020------- to 2030 Base year Target year	52	100 jobs intervened	72 jobs intervened (accumulated)	202 jobs intervened (accumulated)	284 jobs intervened (accumulated)	
	Provide training courses on a continuous basis in OHS in forest operators for service providers, suppliers and operators, aiming to provide more than 600 hours each year 2021----- to 2030 Base year Target year	628 h 457 workers	600h/year	698 h 567 workers	2533 h 2037 workers	904 Service Provider and Supplier Workers and agents in the sector, totalling 3403 hours of training/sessions to disseminate good practices (Portugal). 2989 Service Providers and Occasional Workers, totalling 5049 hours of training in the field of safety (includes classroom sessions, field sessions and awareness sessions in the safety inspections carried out on the work fronts) (Mozambique). Total: 3893 Workers and 8452 hours of training.	
	Achieve Zero Accident Target through continuous safety improvement, with the new 2021-2025 OSH Strategy: - Frequency index ≤2 in 2030 (Internal and external employees) 2020------- to 2030 Base year Target year	Frequency index = 6.6	Frequency index ≤2 **Intermediate targets:** Achieve a Frequency Index =2.6 in 2025 2021----- to 2030 Base year Target year	Frequency index = 5.8 The proposed interim target was not achieved and was carried over to 2024 with the same KPI	Frequency index = 4.1 The proposed interim target has been reached	Frequency index = 2.8	
	Achieve a Frequency Index ≤0.3 in 2025 (Mozambique) 2022------- to 2025 Base year Target year	Frequency index = 2.5	Frequency Index: ≤0.3	----------	Frequency index = 0.36	Frequency index= 0	

Develop Community relations, promoting knowledge transfer and public awareness of the economic, social and environmental importance of forests 	Run Forest Literacy initiatives for primary school children, adolescents and adults, in order to contribute to better knowledge of Portugal's forests, and their environmental, social and economic importance, through the "Dá a Mão à Floresta" (Give the Forest a Hand), My Planet and Florestas. pt projects - Number of initiatives/year (digital and face to face): 10 - Number of children contacted/year: 20 thousand - Number of adolescents and adults contacted/year: 40 thousand 2020------- to 2030 Base year Target year	----------	10 initiatives/year (digital and face to face) 20 thousand children contacted/year 40 thousand adolescents contacted/year **Intermediate targets:** Carry out a roadshow of the Dá a Mão à Floresta project, aimed at primary school children, until 2024. 2020------- to 2024 Base year Target year	5 236 children impacted: 12 face-to-face initiatives 3 editions of the magazine, with an average print run of 15 thousand copies 4 824 adolescents and adults contacted: 7 face-to-face initiatives 2 editions of My Planet magazine, with an average print run of 16 thousand copies 19 face-to-face initiatives: 5 editions of the magazines 1012 digital content 11 quizzes	+ 6 000 children impacted 4 editions of the magazine, with an average print run of 15 thousand copies 540 digital content 12 quizzes 1 edition of My Planet magazine, with a print run of 17 500 copies Presence at the Eucalyptus Forum with an offer of about 260 magazines Activation at the Faculty of Human Sciences of the University of Coimbra 126 digital content 7 awareness actions/participations in initiatives 4 new Partners Visit to 6 schools in several parts of the country Presence in 7 fairs/festivals	+ 6 000 children impacted 3 editions of the magazine, with an average print run of 21 thousand copies 651 digital content 47 504 visitors to the site 12 quizzes Visit to 6 schools in several parts of the country 8 activations in several locations 2 editions of My Planet magazine with a print run of 20 000 copies 177 digital content (74 on social media + 103 articles) 36 700 visitors to the site Florestas.pt: Involvement of the project with educators and students of basic and secondary education in training classes and in presentations Participation in scientific and business events and CACs 5 new partners Visit to 4 schools (more than 215 students)	
	Consolidated Forestry Producers project, promoting and disseminating technical information about forest production, helping to share best practices, by 2030 - Number of initiatives/year (digital and face to face): 10 Number of forest producers contacted/year: 10 thousand 2020------- to 2030 Base year Target year	----------	**Intermediate targets:** Carry out 40 initiatives to contact forest producers by 2025 2020----- to 2035 Base year Target year Hold 4 Forest Producer Meetings by 2025 2023------ to 2025 Base year Target year Ensure 100 new subscriptions by 2025 2023------ to 2025 Base year Target year	8 initiatives: 3 editions of the magazine, with an average print run of 15 thousand copies 200 digital content and 2 forest collection campaigns (in Portugal and Spain) Impact on a community of 15,000 Forest Producers	11 initiatives (10 exhibitions in the agroforestry events in Portugal and Galicia 1 Forest collection campaign in the region of Galicia) 4 editions of the magazine, with an average print run of 15 thousand copies more than 200 digital content 130 participants in the 4th Meeting of Forest Producers Impact on a community of more than 18,000 people	7 initiatives (presence in the agroforestry events in Portugal); 3 editions of the magazine in Portugal, with an average print run of 15 thousand copies; 1 edition of the magazine in Spain, with a print run of 12 thousand copies; more than 200 digital contents; 144 participants in the 5th Meeting of Forest Producers; impact on a Community of more than 21 thousand people. (interim targets achieved in 2025)	

Consolidate the Biodiversity By The Navigator Company project 2022------- to 2030 Base year Target year	----------	Increase visibility on Navigator's biodiversity conservation strategy, by 2025, among urban adults and national NGOs 2022------- to 2025 Base year Target year	Information media on best forestry practices, genetic material and forest collection 100 posts on Facebook and Instagram and 37 content/articles on the website	About 24 700 social media followers 14 299 new followers 96 000 + visitors to the site 156 000 visitors to the site since launch About 210 digital content	40 120 social media followers: 19 400 new followers More than 46 000 visitors to the site; 203 000 visitors to the site since launch; 328 digital content (109 Facebook + 172 Instagram + 47 articles)	
Navigator Forest Producers Club Consolidation 2022------- to 2030 Base year Target year	----------	Ensure consolidation of current benefits and launch a set of new benefits **Intermediate targets:** Ensure 100 new subscriptions in 2026; 2023-------- to 2030 Base year Target year	Goal defined in 2023	The Club's 1st anniversary event was held with the participation of the main Stakeholders number of registered members: 367	Continuous ability to reach more agents in the sector: +600 members Consolidation of launched benefits: Launch of the 1st exclusive job site for the forestry sector, hiring 17 people to work in the forestry sector has already been promoted; the support of €1.3m in the renovation of the machinery park; the promotion of €1.9M through the banking protocol with Crédito Agrícola and an effective saving of €100k for about 60 companies, within the scope of the fuel protocol with Galp, Moeve and OZ Energia.	
Floresta do Saber - Forest Education and Dissemination, Bioeconomy and Bioproducts 2020------- to 2030 Base year Target year	----------	70 000 (accumulated 10 years 2020-2030)	10 510 face-to-face participants 753 activities in 191 face to face events 7 think tanks 2 exhibitions	13 318 participants (from 2020 to 2024: 31187 visits)	12 872 participants (from 2020 to 2025: 43 842 participants) 2500 activities	
Increase the scope and effectiveness of the *e-globulus* platform with national forest producers 2020------- to 2030 Base year Target year	----------	No. of users (accumulated): 35 000 or No. of registered users (accumulated): 1250	More than 20 thousand users accessed the platform 850 registered users More than 82,000 views (Cumulative figures)	27,733 users accessed the platform (accumulated) 1040 registered users (accumulated)	33 663 users accessed the platform (accumulated) 1114 registered users (accumulated)	
Promote the Florestas.pt platform, as a national reference for forest data 2020------- to 2030 Base year Target year	2 initiatives	73 digital initiatives and presences **Intermediate targets:** Host 4 face-to-face initiatives by 2025 2021----- to 2030 Base year Target year Hold a conference on the National Forest theme by 2025	10 sessions with the Academy. 4 editions (thematic) of the newsletter; 23 author articles; 5 new Partners (24 partnerships established since 2020) 9 face-to-face dissemination actions (about 350 people impacted by these events)	6 sessions with the academy 2 editions (thematic) of the newsletter; 21 author articles; 3 new Partners (27 partnerships established since 2020) 7 dissemination actions, in a cumulative total of 31 since 2020 (about 240 people impacted by these events) About 41 000 visitors/month, with about 94% involved in organic research. The intermediate goal of holding the annual Conference was	Involvement of the project with educators and basic and secondary education students in training and presentations Participation in scientific and business events and CACs 5 new Partners Visit to 4 schools (more than 215 students)	

			2022------- to 2025 Base year Target year Carry out 35 initiatives with the Academy (digital and in-person) by 2025 2021----- to 2030 Base year Target year		achieved in 2023, in partnership with Expresso newspaper		
Increase number of products with forestry certification label or EU Ecolabe Core SDG 12.2, 12.4, 12.5, 12.6 15.1, 15.2	Maintain or increase sales of product with an environmental seal (Ecolabel or FSC or PEFC) • UWF: ≥ 70% by 2030 • Packaging: ≥ 60% by 2030 • Tissue: ≥ 99% by 2030 • Pulp: ≥ 80% by 2030 2019------- to 2030 Base year (UWF, Tissue, Pulp) Target year 2023-------- to 2030 Base year (Packaging) Target year	UWF: 52% Packaging: 64.07% Tissue: 90% Pulp: 80%	UWF: ≥ 70% Packaging: ≥ 60% Tissue: ≥ 99% Pulp: ≥ 80%	UWF: 64.20% Packaging: 64.70% Tissue: 94.40% Pulp: 90.40%	UWF: 65.00% Packaging: 54.00% Tissue: 94.00%* Pulp: 80.00% *Does not include UK	UWF: 62% Packaging: 60% Tissue: 95%* Pulp: 88% *Does not include the UK	
Cultivate lasting relations with Customers through active listening and through joint initiatives to respond effectively to their needs Core SDG 9.2	Maintain or increase Customer Satisfaction (CSA) • UWF: CSA ≥ 90% by 2030 • Tissue: CSA ≥ 70% by 2030 • Pulp: CSA ≥ 63% by 2030 • Packaging: CSA to be defined after the first questionnaire in 2025 2019------- to 2030 Base year (UWF, Tissue, Pulp) Target year 2025------- to 2030 Base year (Packaging) Target year	UWF: CSA = 91% Tissue: ISC = 64% Folder: - Packaging: CSA to be defined after the first questionnaire in 2025	UWF: CSA ≥ 90% Tissue: CSA ≥ 70% Pulp: CSA ≥ 63% • Packaging: CSA to be defined after the first questionnaire in 2025	95% in the Paper Customer Satisfaction Index (printing and writing papers) and 67% in the Tissue Customer Satisfaction Index	Satisfaction surveys are only carried out every 2 years	UWF: CSA = 96% Tissue: CSA = 73% Pulp: Pulp satisfaction surveys are carried out every 5 years Packaging: CSA = 96%	
Develop innovative, competitive and sustainable products Core SDG 9.4, 9.5 12.2, 12.4, 12.5 Supportive SDG 17.16, 17.17	Develop innovative, competitive and sustainable products 2023-------- to 2030 Base year Target year	0	15	Goal set in 2023	1 (measurement methodology changed in 2024)	5	
	Develop functional and differentiating tissue products for the fields of hygiene and health 2023-------- to 2030 Base year Target year	4	30	Goal set in 2023	5 (measurement methodology changed in 2024)	2	

Develop sustainable bioproducts, reducing dependence on fossil resources and working towards a decarbonised economy Core SDG 8.2, 8.4 9.4, 9.5 12.2, 12.4 15.2 Supportive SDG 17.16, 17.17	Develop new cellulosic, recyclable and biodegradable materials and composites 2024-------- to 2030 Base year Target year	60	100	Development and optimisation of biocomposite formulations for market testing the production of application prototypes with potential end-users	60 formulations developed (measurement methodology changed in 2024)	30 formulations developed	
	Develop biofuels, biomaterials and biochemicals from cellulosic fibre and forest biomass 2024-------- to 2030 Base year Target year	3	10	Optimisation of the biomass pretreatment process and the process of extracting essential oils from eucalyptus foliage	3 studies (measurement methodology changed in 2024)	1 business case prepared based on the optimisation study	
Promote scientific and technological co-creation in the field of bioeconomy and bioproducts Core SDG 8.2, 8.4 9.5 Supportive SDG 4.4 17.16	Strengthen partnerships with national and international universities and technology centres 2020------- to 2030 Base year Target year	16	16	Consolidation of the network of partnerships with universities and R&D centres, in the context of RRP projects	10 (measurement methodology changed in 2024)	11	
	Promote advanced training, working together with universities: 30 PhDs by 2030 2020------- to 2030 Base year Target year	0	30	23 ongoing PhD, of which 15 have been completed	20 PhDs completed	1 PhD completed	
	Promoting intellectual property registration: 50 patents by 2030 2020------- to 2030 Base year Target year	9	50	43 patents (accumulated) 5 patents submitted	47 patent families (accumulated) (measurement methodology changed in 2024)	53 patents (accumulated) 6 patents submitted	
Ensure that all wood comes from credible sources (FSC or PEFC certification schemes, or controlled origin) Core SDG 12.2, 12.6 13.2 15.1, 15.2 Supportive SDG 17.16	Ensure that the Company's wood consumption incorporates at least 80% certified wood by 2030 2020------- to 2030 Base year Target year	74%	> 80%	69%	73.39% (72.94% originating in the National Market and 73.39% considering the total origin of certified wood received by Navigator)	84% (78.52% originating in the national market and 84.18% considering the total origin of certified wood received by Navigator)	
	Promote chain of custody certification for all our wood suppliers by 2030 2020------- to 2030 Base year Target year	74%	100%	92%	92%	93%	

Invest in low-carbon solutions leading to carbon neutrality Core SDG 9.4 13.1 Supportive SDG 7.2, 7.3	Reduce scope 3 GHG emissions by 37.5% by 2035 Base year emissions: 958 266 t CO_2e 2020----- to 2035 Base year Target year	Base year emissions: 958,266 t CO_2e The calculation of the performance of the scope 3 emission reduction target, in line with the baseline defined in the SBTi, considers Category 1, excluding emissions associated with the acquisition of PCC, pulp, services, wood and residual forest biomass. Categories 3, 4, and 9 are also considered, emissions related to the transformation of pulp into UWF and tissue (Category 10) and 50% of emissions associated with landfills (Category 12).	37.5%	7% increase. (1 023 331 vs. 958 266 t CO_2e	10% increase (1 050 577 t CO_2 vs 958 266 t CO_2e)	11% increase (1 059 752 t CO2e vs 958 266 t CO_2e)	
	Reduce direct CO_2 ETS emissions from industrial complexes by 86% in 2035 (base year:2018) Base year emissions: 774,464 t CO_2 2018----- to 2035 Base year Target year	774,464 t CO_2	86% **Intermediate targets:** Reduce direct ETS emissions by 31.5% of CO_2 from industrial complexes in 2027, compared to 2018 2018----- to 2027 Base year Target year	Reduction of 41.0% (456,689 t CO_2e vs. 774,464 t CO_2e) In 2023, the intermediate target set for the reduction of 31.5% of direct ETS emissions of CO_2 from industrial complexes in 2027, compared to 2018, was exceeded	Reduction of 41% (454,234 t CO_2e vs. 774 464 t CO_2e) In 2024, the intermediate target set for the reduction of 31.5% of direct ETS emissions of CO_2 from industrial complexes in 2027, compared to 2018, was exceeded	37% reduction (485 054 t CO_2e vs. 774 464 t CO_2e) In 2025, the intermediate target set for the reduction of 31.5% of direct ETS emissions of CO_2 from industrial complexes in 2027, compared to 2018, was exceeded	
	Reduce GHG emissions by 63% of scopes 1 and 2 by 2035 (base year: 2020). Base year emissions: 937 710 t CO_2e 2020----- to 2035 Base year Target year	Base year emissions: 937 710 t CO_2e. The base year emissions value is in accordance with what was submitted and approved by SBTi in 2022. For the calculation of the performance of the Scope 1+2 emission reduction target, in line with the baseline defined in the SBTi, emissions associated with fluorinated gases, fleet, own, CH4 and N2O and fertilisers, which represent about 7% of the inventory	63%	Reduction of 26% (697,408 t CO_2e vs. 937 710 t CO_2e)	Reduction of 36% (599 397 t CO_2e vs. 937 710 t CO_2e)	39% reduction (572 079 t CO_2e vs. 937 710 t CO_2e)	
	Use 80% of renewable energy in total primary energy consumption in 2030 2018----- to 2030 Base year Target year	70%	80%	81% **Goal achieved** Includes production for self-consumption of photovoltaic solar power plants	80% **Goal achieved** Includes production for self-consumption of photovoltaic solar power plants	79% Includes production for self-consumption of photovoltaic solar power plants	

Ensure sustainable use of soil and forestry resources, including biodiversity Core SDG 13.1 15.1, 15.2, 15.5 Supportive SDG 6.6 11.4 17.16, 17.17	Create positive impact (or net gain) in biodiversity through framework actions in commitments entered into by Navigator through the initiative act4nature Portugal 2020------- to 2030 Base year Target year	----------	**Intermediate targets:** Implement annual monitoring plans for species and habitats and carry out maintenance, conservation improvement and restoration work on biodiversity and ecological services within the company's managed forest assets, in the following areas: (i) conservation; (ii) renewal; and (iii) ecological restoration ----- to 2030 Target year In terms of ecological restoration, start and/or maintain actions on at least 110 hectares by 2030 ----- to 2030 Target year Maintain the remaining maintenance activities and improvement of the conservation status (actions in at least 30 ha/year) until 2030 ----- to 2030 Target year Perform at least one recovery project for one endangered species and support another by 2030 ----- to 2030 Target year By 2026, define a simplified framework, in line with the key elements of global frameworks of references (e.g. Natural Capital Protocol), to systematise the assessment of impacts and dependencies of B&SE (Biodiversity and Ecosystems Service), testing the approach in a pilot project ------- to 2026 Target year	View Progress Report - act4nature 2023 Commitments (see online)	View Progress Report - act4nature 2024 Commitments (see Appendix 9.3)	Results shown in the table "Actions and resources related to biodiversity and ecosystems" (E4-3, MDR-A), and see chapter 9.3. Progress Report on the Achievement of Act4nature Portugal Commitments

			Carry out, by 2030, training actions with content related to the theme of B&SE conservation and awareness of good business practices, for internal and external employees ----- to 2030 Target year				
	Contribute to the reduction of fires in rural areas, seeking that the burned area under the management of Navigator is less than 1% per year 2018----- to 2030 Base year Target year	2.1%	<1% per year	1.8%	2.66%	2.37%	
	Ensure that the stock of CO_2 sequestered in the forest area under Navigator's management does not decrease by more than 10% compared to 2022 (reference year), by 2030 2022------- to 2030 Base year Target year	6.1 M t CO_2 eq	Positive variation in the stock of CO_2 sequestered in the forest area under Navigator's management compared to 90% of the 2022 value (reference year)	6.2 M t CO_2eq	6.4 M t CO_2 eq (+4.9% compared to 2022)	6,6 M t CO_2 eq (+8.2% compared to 2022) (calculation methodology changed in 2025)	
Promote efficient use of resources, minimising our ecological footprint Core SDG 8.2, 8.4 · 9.4 · 12.2, 12.5 · 13.1, 13.3 · 15.1, 15.2 Supportive SDG 6.3, 6.4 · 7.3	Study the potential for reduction and consumption of water in the Espirra nursery, with a reduction of at least 10% of water use by 2030 2022------- to 2030 Base year Target year	364 000 m^3	260 000 m^3/year	Decrease 15% (310 100 m3/year compared to 2022)	21% decrease (288 279 m3/year compared to 2022	18% decrease (297 918 m3/year compared to 2022)	
	Monitor the impact of the production forest on water management 2019------- to 2030 Base year Target year	Installation of two forest experimental basins for flow quantification and monitoring of hydrological responses	Knowledge of hydrological dynamics in forested experimental basins and the relationship with forest management, corroborated in published works or other forms of dissemination	Goal set in 2023	Frequent collection of field data and integration into the eco-hydrological model, leading to a better understanding of the interaction between crops and water use	Continuous monitoring of the basins. Modelling the eco-hydrological responses of the two hydrographic basins dominated by eucalyptus, with contrasting edaphoclimatic characteristics, in the face of future climate scenarios (manuscript prepared for submission). A new study with an external R&D entity to evaluate the source of water used by different occupations.	
	Reduce the specific use of water (m3/t of product) by at least 33% by 2030 Specific use of the base year: 22.4^{m3}/t 2019------- to 2030 Base year Target year	22.4 m^3/t	33%	5.1% decrease (21.2 m^3/t vs. 22.4 m3/t)	8.5% decrease (20.5 m^3/t vs. 22.4 m3/t)	8.4% decrease (20.5 m3/t vs. 22.4 m3/t)	
	Reduce the organic load in Navigator's industrial effluents by 10% by 2030, compared to 2022 (measured in kgCOD/t product) 2022------- to 2030 Base year Target year	4.6 kg COD/t	10%	2% increase (4.6 kg COD/t)	12% increase (5.1 kg COD/t)	5% increase (4.8 kg COD/t)	

	Optimise the energy intensity, year after year 2020------- to 2030 Base year Target year	----------	----------	12.9 GJ/t	12.7 GJ/t	13.7 GJ/t	
Promote circular bioeconomy, prioritising R&D solutions Core SDG 8.4 9.4 12.2, 12.4, 12.5 Supportive SDG 17.16, 17.17	Achieve, by 2030, a waste disposal rate in an industrial landfill of less than 10% 2021----- to 2030 Base year Target year	14%	<10%	12%	12%	16%	
	Develop sustainable, value-added applications for the industrial process by-products (sludge, ash and other inorganic waste) 2020------- to 2030 Base year Target year	----------	----------	The partnership with Specialty Minerals Inc. was continued in Figueira da Foz, which allowed the recovery of about 4800 tons of carbonate sludge, an increase of about 3800 tons compared to 2022. Within the scope of partnerships with the construction sector, through the incorporation of sands from the fluidised milk biomass boiler (by-product) in the production of concrete blocks, in 2023, it was possible to dispose of about 35.6 thousand tons of sands (+25.5% compared to 2022)	1355 tons of ash valorised into concrete artefacts 1260 tons of carbonate sludge recovered in the production of CCP 39 995 tons of sands (by-product) recovered for the construction sector	10 746t of ash valorised in concrete artefacts 764t of carbonate sludge recovered in the production of CCP 32 324t of sand (by-product) valued for the construction sector	
Develop adaptive forestry practices in the context of climate change Core SDG 8.2, 8.3, 8.4 9.2, 9.4, 9.5 13.1, 13.3 15.5 Supportive SDG 17.17 Local SDG 2.5	Develop genetically enhanced clonal and seminal plants, with 30-50% productivity gains and resilient to climate change 2020------- to 2030 Base year Target year	----------	Maintain volume and paste gains (30- 50%) and/or enrich genetic diversity (for biotic and abiotic factors)	Incorporation of 29 seed lots related to 24 species by import and harvest in the Portuguese arboretum "Escaroupim", to increase the diversity of the Long-term Genetic Improvement Program via hybridisation with E. globulus	3 new clones delivered to the Viveiros Aliança portfolio with a genetic gain of 41% (volume and paste), all of them Neopestalotiopsis-resistant, and two with known Ophelimus-resistant	In the E. globulus seed orchard, 250 kg of capsules were collected that will produce about 1 kg of improved seed, translating into about 300,000 plants for use in operational afforestation. Eighteen trials were measured, bringing 146 new clones (15 of them hybrids) and 39 new families (4 of them hybrids) for genetic analysis, contributing these materials to the diversity of the PMG and making it possible to recommend in the medium/long term new and more diversified and more productive clones that will contribute to the resilience of the eucalyptus forest.	

	Introduce and promote the establishment of natural enemies for 2 eucalyptus pests 2020------- to 2030 Base year Target year	----------	----------	The release of Anagonia, Gonipterus' new natural enemy, has begun. Application for the import of Ennogera, a natural enemy of trachymela, was approved by the ICNF – Institute for the Conservation of Nature and Forests	Two natural enemies of two important eucalyptus pests were produced in a bio-factory and released in the field. The effect of these natural enemies is being monitored in the field	Production and release of 2 natural enemies: Anagonia and Cleruchoides. A survey was conducted in Australia to identify potential natural enemies of three further eucalyptus pests: Trachymela, Ophelimus and Phoracantha.	
	Identify at least 1 natural enemy of *Acacia dealbata* and introduce it in Portugal 2024-------- to 2030 Base year Target year	----------	----------	----------	Regarding new natural enemies, several species of acacia defoliators have been imported from Australia, whose potential is being studied by RAIZ, to assess which species may be beneficial as biological fighting agents	Populations of 4 natural enemies were established in the RAIZ confinement facilities. Biology studies were carried out and host specificity studies began.	

3.4.5. Stakeholder involvement

The Navigator Company's responsible management strategy aims to generate economic, social and environmental impact throughout the value chain, listening and aligning the expectations of our Stakeholders with Navigator's strategy and needs.

We aim to create long-term value for the 10 groups of relevant Stakeholders we establish relations with. It is worth mentioning that the stakeholder groups were identified in an internal workshop, with members of the Executive Committee, within the scope of the materiality analysis process that took place in 2015. This mapping is reviewed and updated regularly, ensuring it remains up to date and ensuring integration of identified expectations as to the themes considered more relevant for the future of the Company and the relevant identified Stakeholders did not change compared to the previous year.

We use several **forms of communication and engagement**, and the channels and frequency rate may change, depending on the Stakeholder group and the identified needs. In this way, we seek to consolidate trust relationships and social license to operate, increasing transparency and identifying possible risks and opportunities.

For the Company, the dialogue with Stakeholders is a legitimate institutional positioning instrument and an exercise of organisational citizenship, assisting the design of public policies and decisions more balanced and aligned with reality. When carried out with transparency, it reinforces the democratic quality of decisions and the representativeness of solutions.

Transversal communication channels, are the Company's emails, website and social media, as well as the wrongdoing reporting channel (Chap. 5.4.1)

Among the formal mechanisms for direct interaction with the several stakeholder groups, we highlight the established bilateral communication channels, such as the **Labour Forum**, and interactions with workers' representative structures (Chap. 5.3.1); the **Community Monitoring Committees** (Chap. 5.3.3) and **Community Liaison Agents**, who help to foster a close relationship between the Company and the local Communities in Mozambique (Chap. 5.3.3) – important initiatives to understanding the concerns of the Communities, seeking to meet their needs and incorporate practices in our action plans.

The Navigator **Sustainability Forum** (Chap. 5.1), a sustainability governance structure, is also an important space for dialogue. We highlight the participation of its members in the process of analysing double materiality (Chap. 5.1) and the annual sessions we promote with the participation of national and international Experts, to discuss matters relevant to the Company's business and our Stakeholders.

Navigator also has a structure, composed of members of the Academy – the **Environmental Council**, in charge of monitoring the Company's environmental performance (Chap. 5.1), hosting regular meetings throughout the year.

From a perspective of continuous improvement and as part of our purpose to share our knowledge and resources with society, we have several information channels available, aimed at Communities (Chap. 5.3.3) and Forest Producers (Chap. 5.2.6.).

It is also worth mentioning the Public Affairs Department work, in charge of promoting a close relationship with institutional stakeholders, and developing advocacy initiatives in the regulatory, environmental and social spheres. The work developed in 2025 highlights the strategic value and its potential contribution to aligning public policies with the challenges of sustainability, competitiveness and the development of forest-based bioeconomy in Portugal and Europe.

In a framework marked by increasing regulatory complexity, sustainability requirements and greater public scrutiny in sectors with operations based on natural resource use, the Public Affairs area focuses on informed and transparent dialogue with policymakers, sectoral associations, institutional partners and communities. This activity rested on analysis and preparation work to support interactions with different Stakeholders and in 2025 totalled more than 100 meetings, visits and events

The Navigator Company aims to generate economic, social and environmental impact along the value chain, listening and aligning the expectations of our Stakeholders.

Relationship with our Stakeholders

We aim to create long-term value for the 10 groups of relevant Stakeholders we establish relations with.

STAKEHOLDER GROUPS *AND* PURPOSE OF ENGAGEMENT	HOW WE ENGAGE	RELEVANT TOPICS	HOW WE CREATE VALUE
SHAREHOLDERS/INVESTORS Promote long-term sustainable value, aligned with strategic objectives, reinforcing credibility and corporate reputation	* Investor Relations * General meeting * Dedicated events * Roadshows * Quarterly earnings presentation conferences * Annual and quarterly reports * ESG performance information * ESG Ratings * Regular reporting of financial and non-financial information * Meetings and visits to our facilities * Environmental Committee * Sustainability Forum	* Strategy * Operational and economic-financial performance * ESG Performance * Risks and opportunities management * Efficient capital allocation * Innovation and long-term value creation	• Clear communication with investors • Harm reduction • Operational optimisation • Asset optimisation • Increased revenues, new markets, product diversification and dividend distribution • Submission of intellectual property patents
EMPLOYEES Promote an inclusive and stable environment, ensuring appreciation of people, safe conditions and well-being. Encourage motivation and satisfaction, support continuous personal and professional development and reinforce the Company's purpose aligned with the internal culture.	* Pension Fund Board of Trustees * Labour Forum * Directors' Forum * Intranet * My Planet * Navigator Forestry Conference * Navigator Business Conferences * Straight to the Top program. * Meetings between the Executive Committee and the Workers' Committee * Collective bargaining instruments * Navigator Family Tour – Visits to our facilities * Future leaders forum * CRESCER Project * Digital Forum * "Conhecer o Eucalipto" Project * Holiday camp – for children of Employees * Employee Guide 2) Direct communication channels – Rhresolve and RH+próxima 3) Florestas.pt platafom	• Health, safety, and well-being • Compensatory benefits and remuneration • Working conditions and job stability • Work life balance • Culture and business purpose • Diversity, equity, inclusion and belonging • Training and continuous development • Talent retention	• Labour stability • Competitive compensation, performance and productivity awards • Family benefits and support • Training, development programs and career opportunities • Creating safe and welfare-promoting working conditions • Awareness raising for health care and preventive medicine • Pension fund management • Promotion of a sense of purpose
BUSINESS ASSOCIATIONS To defend common strategic interests, contribute to a legal framework that fosters competitiveness and innovation within the sector, and promote collaboration and knowledge-sharing among companies.	• Sustainability Forum • Participation in events and governing bodies of sectoral associations in fields such as energy, forestry and sustainable development • Meetings • "Conhecer o Eucalipto" Project • Navigator Tour – Visits to our factories and nurseries	• Competitiveness and regulatory framework • Technological innovation and development • Collaboration for sector solutions • Decarbonisation and energy transition • Resource use and circular economyResource use and circular economy	• Contribution to the design of shared solutions to economic, environmental and social challenges of the sector, regions and the country • Active participation in development projects and support to forest producers through Biond - Forest Fibres from Portugal • Business and industrial symbioses

STAKEHOLDER GROUPS *AND* PURPOSE OF ENGAGEMENT	HOW WE ENGAGE	RELEVANT TOPICS	HOW WE CREATE VALUE
OWNERS AND FOREST ASSOCIATIONS Share knowledge on sustainable forest management and promote local economic development, valuing ecosystem services.	• Sustainability Forum • Technical support and training • Navigator Forest Producers Club • Annual Meeting of Forest Producers • Exhibitions • The *e-globulus* platform • Florestas.pt platform • Collaboration protocols • Forest Producers Magazine • Navigator Family Tour – Visits to our facilities • "Conhecer o Eucalipto" Project	• Sustainable forest management • Prevention of fires and climate risks • Valuing ecosystem services • Technical training and production support • Biodiversity conservation • Forest certification	• Technical training • Tools to promote responsible and sustainable forest management • Large scale clone production enhancing a healthier and more productive forest • Genetic improvement of plantations • Fire prevention and firefighting support • Solutions in the control of pests and other biotic risks in plantations • Valuing ecosystem services through sustainable forest management and biodiversity conservation • Increase efficiency in forest production
CUSTOMERS Promote satisfaction and improvement of product quality, identifying their needs and developing innovative solutions.	• Commercial operations • Periodic enquiries • Advertising campaign • Satisfaction surveys • ESG questionnaires • Complaints • Meetings and visits to our facilities • Specialised webinars and events • "Navigator, no Lado Certo do Futuro" • Training sessions	• Pricing and activity setting • Product safety, quality and certification • Environmental performance • Sustainable design • Deforestation • Product life cycle • CO_2 emissions • Social responsibility	• Quality products, mostly with certification seals • Responding to market needs • New products and services • Close relationships and trust that generate value for Consumers • Training sessions on Safety in forestry operations
GOVERNMENT ENTITIES AND REGULATORS	• Advocacy activities – Public Affairs area • Community Monitoring Committees • Sustainability Forum • Formal response to legal	• Valorisation of the national forest/active forest management • Rural development • Energy transition - renewable and	• Preparation of proposals under the Forest Intervention Plan 2050 • Drafting proposals in defence of the EU Anti-Deforestation Regulation

STAKEHOLDER GROUPS *AND* PURPOSE OF ENGAGEMENT	HOW WE ENGAGE	RELEVANT TOPICS	HOW WE CREATE VALUE
Ensure compliance with laws and regulations and contribute to public policies that promote sustainable development and competitiveness.	requirements • Meetings and responding to requests • Navigator Family Tour – Visits to our facilities	competitive energy • Fighting deforestation • Circularity and waste management • Forest-based bioeconomy • Forest-based products as an alternative to single-use plastic • Decarbonisation / Reducing CO_2 emissions • Water resources management • State Reform - de-bureaucratisation and simplification of processes • Responsible international trade	• Boosting the national business fabric and promoting exports • Contribution to the improvement of rural development policies and the achievement of the country's decarbonisation targets with concrete proposals/action plans • Participation in the Business Roundtable Portugal Association • Preparation of proposals to eliminate US customs duties on the pulp and paper sector • Involvement with relevant municipalities • Initiatives of legitimate representation of interests in the national parliament and the European Parliament focused on the Forest theme • Active and continued participation in the institutional dialogue on Forest Law and Regulation in Mozambique, aiming at the progressive adaptation of the legal framework to a commercial forest plantation sector in development
SCIENTIFIC AND TECHNOLOGICAL SYSTEM Promote applied research and knowledge transfer, foster innovation and technological development, stimulate collaboration in R&D projects, support sustainable and competitive solutions and share good practices between the academy and the industry.	• Environmental Committee • Sustainability Forum • Scholarships and Master's degrees • Research partnerships (RAIZ) • Protocols with universities • Floresta do Saber • Navigator Tour – Visits to our factories and nurseries • "Conhecer o Eucalipto" Project	• Operational efficiency • Portfolio diversification • Sustainable management of the forest • Innovation • Decarbonisation	• R&D investment • Generation and dissemination of knowledge • Partnerships with universities and institutes for the production of knowledge under co-creation • Creation of scientific jobs • Development of bioproducts • Industrial symbioses
NGOs Share knowledge and good practices and promote partnerships for social and environmental initiatives.	• Sustainability Forum • Community Monitoring Committees • Collaboration protocols • Navigator Family Tour – Visits to our facilities	• Climate change and decarbonisation • Protection of biodiversity and ecosystems • Sustainable management of the forest • Water resources management	• Participation in relevant NGOs in the field of sustainable forests and biodiversity conservation. Ex: Wildlife Conservation Society • Dialogue with NGOs within the Navigator Sustainability Forum

STAKEHOLDER GROUPS *AND* PURPOSE OF ENGAGEMENT	HOW WE ENGAGE	RELEVANT TOPICS	HOW WE CREATE VALUE
SUPPLIERS/SERVICE PROVIDERS Promoting trust relationships and transparency, fostering responsible practices in the supply chain, ensuring quality and compliance in processes and stimulating innovation and continuous improvement.	• Sustainability Forum • Compliance statements • Technical visits to the facilities of the Suppliers of chemical raw materials • Annual Meeting of Forest Producers • Forest Producers Magazine • Navigator Family Tour – Visits to our facilities • Navigator Hub • Suppliers' Day • Navigator Forest Producers Club • "Conhecer o Eucalipto" Project	• Health, safety, and well-being • Human Rights • Decent work conditions • Deforestation • Decarbonisation • Water Resources Management	• Supplies and provision of services • Job creation and boosting the national business fabric • Sharing values and good practices • Support in reducing the carbon footprint • Technical training sessions
COMMUNITY Promote social development and local economic situation and strengthen dialogue and the close relationship with the Communities.	• Community Monitoring Committees (CMC) • Liaison officers (Mozambique) • Dá a Mão à Floresta • Floresta do Saber • Biodiversidade.com.pt • Florestas.pt platform • Sustainability Forum • My Planet • Navigator Family Tour – Visits to our facilities • Navigator Forest Producers Club • "Conhecer o Eucalipto" Project • Social Development Program in Mozambique	• Strengthening social and financial resilience • Sustainable management of the forest; Biodiversity conservation • Forest literacy • Decarbonisation Roadmap • Social responsibility projects • Employee training and development • Noise and odours • Resource use and circular economyResource use and circular economy • Atmospheric emissions • Water resources management • Decarbonisation	• Promotion of the rural economy and bioeconomy • Job creation • Empowerment of young talent • Investing in the Community • Forest literacy promotion • Valuing ecosystem services through sustainable forest management and biodiversity conservation • Contribution to the mitigation of climate change risks through carbon sequestration and investment in renewable energy sources • Reduction of the impacts of atmospheric emissions, noise and odours, and waste generation • Reduction of impacts of net emissions on water bodies • Better knowledge and ability of action daily, preventing potential impacts (environmental and social)

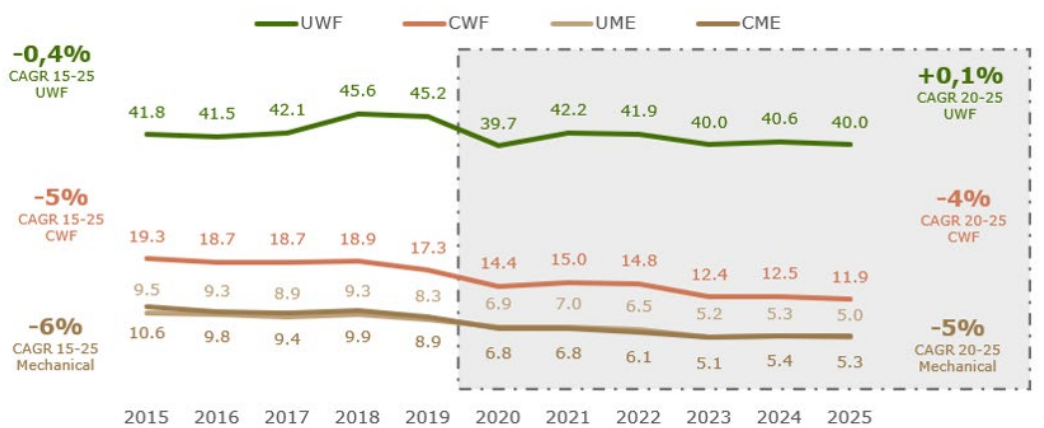
4. Performance in businesses

4.1. The printing and writing papers industry

Em 2025 (novembro), a procura aparente global de todos os papéis de Impressão e Escrita apresentou uma redução de 2,4%, com o Papel UWF a manter-se a grade mais resiliente, com um decréscimo de 1,5% comparando com papéis revestidos (Coated Woodfree – CWF), que recuaram 4,8%. Por sua vez, os papéis produzidos a partir de fibra obtida por via mecânica (revestidos – coated e não revestidos – uncoated) registaram uma diminuição de 3,2%.

De realçar que o UWF continua o segmento mais resiliente, dada a versatilidade de usos que apresenta.

Global Printing & Writing Demand *(kt)*



Source: PPPC, annual series YTD November

In Europe, apparent demand for uncoated printing and writing paper (UWF) was down by 5% in relation to 2024, as deliveries and imports shrank across the continent. Intra-European deliveries dropped by 5% and European imports fell by 10%, in relation to the previous year, confirming a sharp slowdown in effective demand in the region.

In the United States, the reduction in consumption YTD November was more moderate (down 3.8%). The closure of the largest mill of a major local producer further added to the structural need for imports, which grew by 16% over the previous year, also leveraged by anticipation of purchases in order to avoid the new tariffs. The sector's heavy dependence on imports, exacerbated by the capacity closure and application of customs tariffs, drove up prices, which are expected to remain at high levels.

Navigator's operating rate (measured as deliveries over rated capacity) stood at 87% (up 8 pp YoY), whilst the rate for the European industry as a whole recovered slightly from 79% to 81% (up 2 pp on 2024).

It should be stressed that, in 2025, Navigator increased its market share of total deliveries by 1.5 percentage points in relation to the same period last year, achieving a share of approximately 26%. This growth was driven by strong performance on international markets (up 5 pp), while our share on European markets rose by 0.5 pp to 19%.

UWF order books for the European industry fell by 1% in relation to 2024 (down 5 pp in Europe and up 17 pp on international markets). Weaker order books reflect market uncertainty, which has led clients to delay purchasing decisions. Bucking the trend, Navigator recorded growth of 13% in the inflow of client orders (up 8% in Europe and up 20% on international markets), in relation to 2024, enabling its order books to return to very comfortable levels, after the squeeze they experienced in late 2024. In December, Navigator reduced its volume of stocks by 44% (to 15 days), thereby ending the year at all-time low levels.

The benchmark index for the price of office paper in Europe - PIX A4 B-copy – recorded an average of 1,003 €/t in 2025, down by 9% on 2024, more resilient than the reduction in the average PIX for hardwood pulp in Europe, which was down by 15% on the previous year. Even with significant adjustments, UWF market indexes remain strong, still higher than historical levels (up 153€/t; 18% above the average for 2016-2020).

In Europe, Navigator's average sales price matched the evolution of the benchmark prices, but with two distinct strategies. On the one hand, we achieved greater penetration in budget products, enabling us to capture additional volume, with a negative impact on the average price, given the rich product mix that Navigator has historically maintained in its Paper business. At the same time, we increased the price premium on products with greater value added, especially for the Navigator brand, which benefited in 2025 from a price premium hike of 8 pp. On the international markets, prices were penalised by the weaker dollar and, mainly, by the drop in the PIX BHKP China index.

Navigator's UWF and Packaging Paper sales totalled 1,297 thousand tons, up by 6% on 2024. Lower international paper prices meant however that the sales measured in euros were down by 6% (vs. 2024).

4.2. Pulp Market

The pulp market came under severe pressure this year, visible in the sharp downturn in pulp prices in China from April onwards, with an impact in Europe.

The recovery which started in August, when pulp prices bottomed out, gained traction in the 4th quarter, which saw a visible improvement in prices in China. Despite ending more favourably, 2025 proved to be the worst year, in nominal terms, for pulp since 2016 (not counting 2020): the average annual price in China was 540 dollars, representing a reduction of 103 dollars on 2024 (down 16%). Although the dollar price was (nominally) higher than in 2020, from the perspective of a Brazilian producer, when adjusted for accumulated inflation in Brazil and foreign exchange variations over the period, the real figure in 2025 was lower than that for 2020.

In Europe, 2025 started with the benchmark index dropping to a low point of 1,000 $/t, recovering to 1,218 $/t in April (up 16%), but the direction of travel was reversed in the months that followed, falling back to 1,000 $/t in August, where it stayed until late September and then prices rallied in the fourth quarter. The hardwood pulp benchmark index – PIX BHKP - in dollars ended the year at 1,100 $/t, reflecting the recovery. The gross price of hardwood ended the year at an average of 1,088 dollars, down 149 dollars on the previous year (down 12%).

The dynamics which explain this depressed price environment include: i) Global overcapacity: the increase in capacity in Latin America in 2024 was joined by very significant expansion in hardwood pulp in China (3.4 Mt in 2024 and 2.8 Mt in 2025, with totals of 5 and 4 new mills, respectively), as part of an upstream integration strategy by Chinese paper producers; ii) Increased incorporation of local wood in China, by these small and medium-sized units which benefited from highly competitive capex per

ton, from temporary availability of domestic wood, previously sent to the chipboard industry, but redirected to the cellulose pulp sector as a result of the property sector crisis, and from substantial state support, in particular in financing terms, job creation and energy production. These integrated mills may establish a new operating paradigm in Asia, functioning intermittently depending on the availability and price of woods, on public incentives and international cellulose prices; iii) Overcapacity in paper production and weak domestic demand in China, squeezing paper prices, and consequently pulp prices. Operating rates in most sectors stand at between 60% and 70%, raising significant questions as to the sustainability of the model in the long term; iv) Falling demand in Western economies, above all in printing paper segments contributing to a contraction of 1% in European hardwood pulp demand (YTD November), as well as in Tissue and Packaging segments; v) Tensions in international trade, with customs tariffs and geopolitical uncertainty feeding volatility and pushing prices down faster.

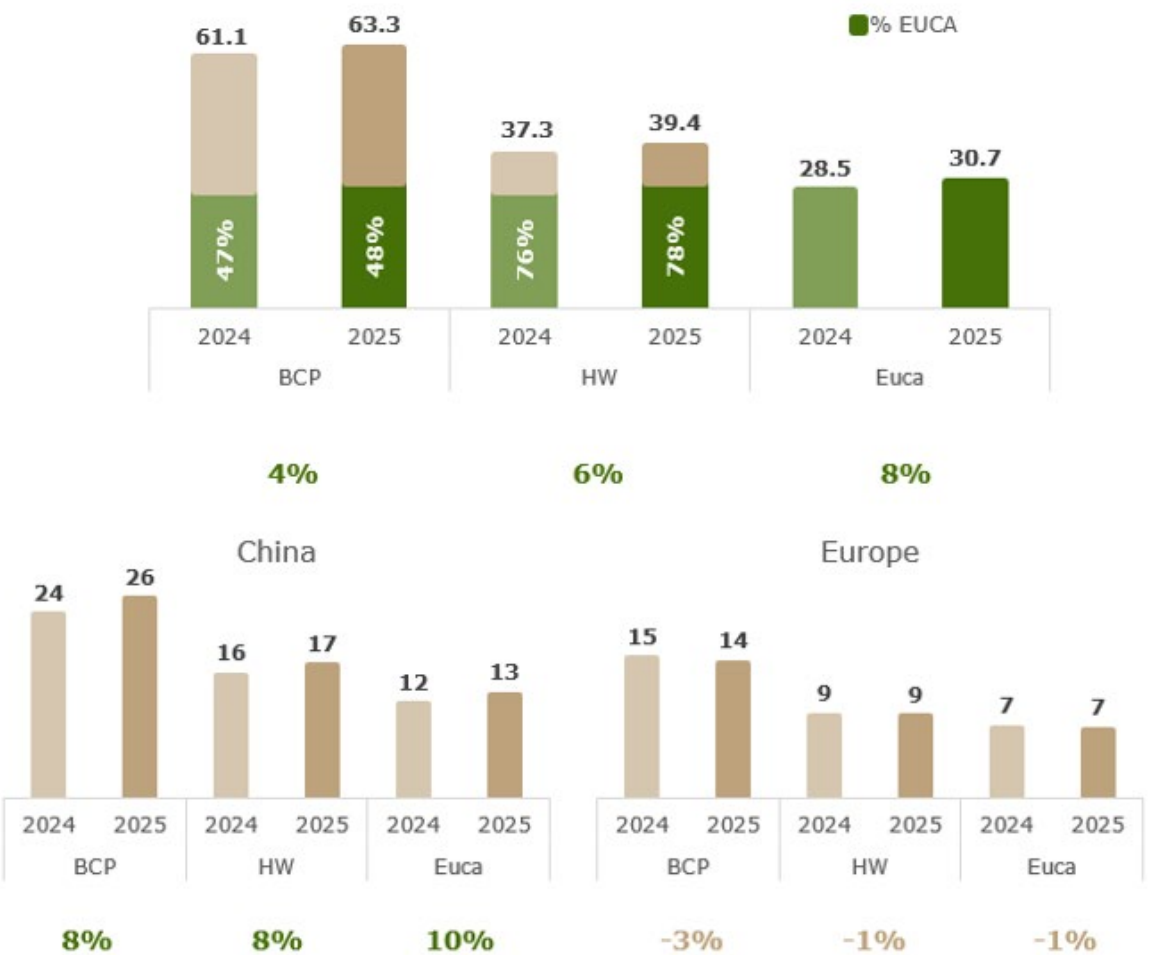
Nonetheless, global demand for market hardwood pulp grew by 6% YoY (YTD November). China remains the main engine of growth, with an impressive increase of 8%, compared to +7% for the Rest of World. In contrast, demand in Europe has continued to fall, in line with shrinking consumption of printing paper, edging down by 1%. In the USA, demand dropped by 3%, after heavy restocking in 2024.

The strongest global growth in 2025 was for eucalyptus pulp (EUCA), up by 8%, with China growing 10% and Europe in line with 2024. This performance has consistently boosted EUCA's share in the hardwood bleached chemical pulp segment.

Significantly, eucalyptus fibre has continued to strengthen its position in relation to long fibre, due to the latter being less competitive and the technological advances achieved both in plant and in high quality eucalyptus fibre - like that produced by Navigator.

On the supply side, the ramp-up of projects that moved on to the market in 2024 increased the availability of market pulp in 2025, exerting a degree of pressure on operating rates; the operating rate for BHKP production in China was 92% in 2024, but is expected to fall to 76% in 2025 (down 16 pp).

Global Pulp Demand *(kt)*



Source: PPPC, November 2025

Navigator's pulp sales totalled 347 thousand tons, down by 11% on 2024, due to decreased output of pulp exacerbated by the fire in Setúbal in July, by maintenance shutdowns and by increased incorporation of pulp in UWF Paper and Packaging. The value of sales fell by 26% YoY, as a result of the drop in prices.

4.3. Tissue

Growth and strong performance in Tissue business

European demand for Tissue paper grew by 1.2% YTD November, with western Europe making a positive contribution of 0.7% and eastern Europe 2.8%, after impressive growth in 2024 of 6.3%.

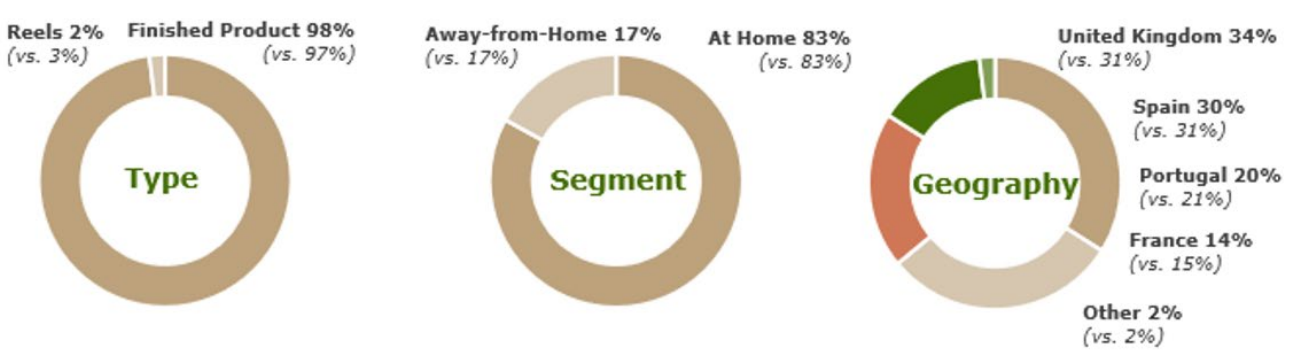
During 2025, Navigator's Tissue sales (finished products and reels) totalled 231 thousand tons, up by 5% on 2024, with the value of sales up by 6%. This growth was boosted by the integration of Navigator Tissue UK, in May 2024, which, as well as extending the product range and contributing to growth in sales, expanded the customer base and generated integration synergies. It has also permitted cross-selling, which has further strengthened commercial relations with clients.

The Tissue segment combines two operations based on distinct models: the Iberian operation is integrated, entailing both paper production and converting into finished products. In contrast, the operation in the United Kingdom is centred exclusively on converting into finished products, meaning that there is no margin from paper production. The business margin in the United Kingdom operation is structurally lower and, due to its size, this takes around 1.2 pp off the Group's margin.

International sales in Tissue business accounted for 80% of the sales volume in 2025 (vs. 54% in 2022, prior to integration of Tissue Ejea and Tissue UK). The English market took the largest share, with 34% of sales, followed by Spain, with 30%, and France, which accounted for 14% of sales.

In the last two years, acquisitions of new units in Spain and the United Kingdom have enabled us to balance our geographical mix, offering greater resilience, focussing essentially on finished products (which accounted for 98% of total sales, with reels on 2%). In terms of client segment stratification, At Home or Consumer (retail) business has grown in importance, currently accounting for around 83% of sales, whilst the Away-from-home segment (wholesalers - Horeca channel and offices) accounts for the remaining 17%.

Tissue Sales *(kt)*



4.4. Packaging

From Fossil to Forest – investment in sustainability, innovation and change

The European market in machine glazed (MG) and machine finished (MF) kraft paper also recorded modest growth (2.6%) in 2025.

Navigator's total Packaging sales in 2025 were up by 8%, supported by growth in tonnage of 11%, and a 17% increase in the area of paper sold, thanks to increased penetration in lightweight (low grammage) segments.

The FLEX (Flexible Packaging) segment achieved the best growth. The top performers were low grammage food and non-food packaging solutions, which are strategic priority areas for our business, together with release liners for feminine hygiene and personal care markets, made exclusively from eucalyptus fibre. These segments benefit in particular from the use of lightweight papers, where *Eucalyptus Globulus* offers significant competitive advantages, both economically and technically.

The Packaging segment performed consistently over the year, with a gradual increase in sales. At present, 71% of our sales are in Europe and the remaining 29% on overseas markets – the Americas and MENA (Middle East and North Africa).

Navigator has therefore continued to broaden its customer base in an operation 100% based on its own brand - gKraft™. Our packaging paper offering is based on three **gKRAFT™** segments: **BAG, FLEX and BOX**. The innovative introduction of the properties of eucalyptus fibre in these products has been crucial in securing broad acceptance and recognition in the market.

In early 2026, our most recent range of moulded pulp products, **gKRAFT™ Bioshield**, which features trays, bowls and plates designed as ecological alternatives to disposable plastics, won the **2026 Five Starts Award** in the **Sustainable Packaging** category.

4.5. Energy

78% of Power Output generated from renewable energy sources

Energy sales in 2025 stood at approximately € 99 million, down 20% on 2024. This reduction was essentially due to the following issues: i) The renewable cogeneration units in Aveiro and a turbo-generator (TG3) in Figueira da Foz switched to production for internal consumption as from May, together with the turbo-generator in Setúbal, in November, as a result of the special pricing system being discontinued, and ii) The maintenance shutdown at the Aveiro Biomass Power Plant.

2025 saw significant variations in power and natural gas costs, especially in natural gas where 1st quarter prices rose to close to 48€/MWh whilst fluctuating in the 4th quarter at around 32€/MWh. In relation to 2024, the TTF, the benchmark index for the European natural gas market, was up by around 12% and the spot prices for electricity in the Iberian market (OMIE) rose by approximately 5%. Prices have peaked this year at 143 €/MWh for electricity and 58 €/MWh for natural gas.

The group's industrial units continued to actively serve the manual Frequency Restoration Reserve Band Market (mFRR Band). This system service, provided to the operator of the power grid by qualified consumers, helps to safeguard the security of supply in the National Electrical System, which has already proved to be decisive for protecting domestic consumers and critical users. Over the course of 2025, Navigator was mobilised on 16 occasions to reduce its power consumption, under the mFRR Band service.

Following on from the decision of the European Commission, on 24 April 2025, ERSE (the Portuguese energy services regulator) approved ERSE Directive 6/2025, setting the prices of the Grid Access Tariffs (TAR) applicable to power consumption facilities which obtain the status of electrointensive consumer. Within this framework, Navigator's high voltage consumption facilities now benefit from a significant reduction in the CIEG (general economic interest costs) charges on the overall system use tariff.

4.6. Financial performance

Tissue and Packaging account for more than 32% of EBITDA

The Company's diversification strategy has presented consistent results, with the new Tissue and Packaging segments already accounting for 32% of the group's EBITDA. This performance has helped cushion the impact of the pressure on profits from sharply falling Pulp and Paper prices over the period.

We also remain focused on the resilience of our operations, on optimising resources and generating sustainable value for the organisation, ensuring improved operational efficiency and financial discipline, reaffirming our ability to adapt to future challenges.

Cash costs were impacted in 2025 by the maintenance shutdowns at the units in Figueira da Foz, Aveiro and Setúbal, meaning that overheads were less thinly spread, and by the costs stemming from anti-dumping duties and customs tariffs. Even so, unit cash costs ended the year lower than at the start of 2025.

It should be stressed that the impact on EBITDA, resulting from the instability in costs and prices over the period, was cushioned by the Company's policies for managing financial risk, in particular through the fixing of electricity and natural gas prices, as well as foreign exchange hedges.

In this context, Navigator recorded EBITDA of € 376 million in 2025 (vs. € 547 million in 2024), with an EBITDA margin of 19% (down 7 pp year-on-year).

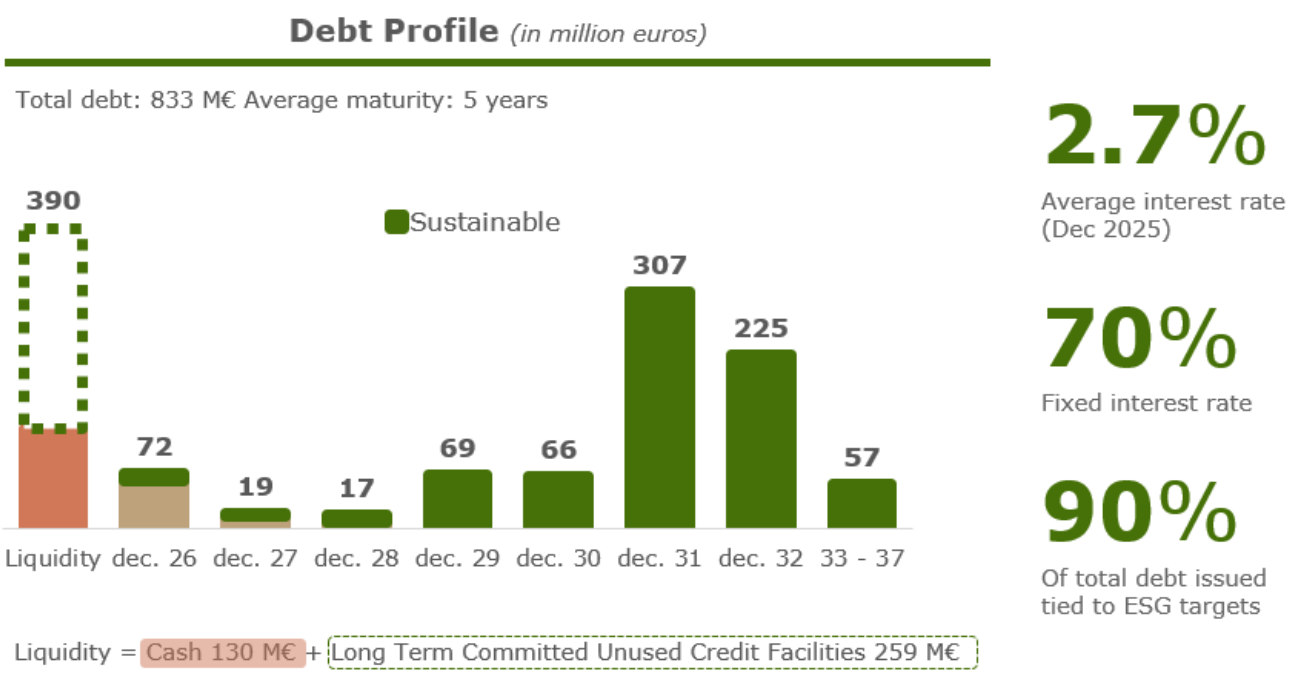
4.7. Sustainable Financial Management

At 31 December 2025, net debt stood at € 704 million, up by € 86 million on December, despite a dividend payout of € 175 million and the current period of heavy capital expenditure (outgoings of € 210 million in 2025). The Interest Bearing Net Debt/EBITDA ratio stood at 1.87x, further consolidating the financial strength displayed by the Group.

Debt repayments of € 445 million were made over the year, of which € 335 was repaid early, with the dual aim of increasing the average debt maturity and increasing the proportion of debt with sustainable features.

Long term facilities of € 540 million were contracted over the year (€ 325 million in bond issues, € 40 million in loans and € 175 million in commercial paper with placement guarantee), of which facilities totalling € 259 million are as yet unused. This includes the € 40 million loan from the EIB, the first tranche of a total facility of € 80 million, intended for a series of projects geared to accelerating Navigator's decarbonisation plan. In the 4th quarter of 2025, Navigator contracted a total of € 175 million in Sustainability-Linked commercial paper, with a placement guarantee and maturities of between 5 and 7 years, enabling debt to be mobilised more flexibly, and featuring an average maturity of 6 years.

The € 275 million in bonds negotiated and issued over the period has a maturity of 7 years and contributed to extending average debt maturity to 5 years, up from 3.5 years in December 2024, whilst retaining rationally staggered repayments and boosting the proportion of debt indexed to sustainability indicators to 90% (vs. 65% in December 2024). At the end of the period, 70% of total debt issued was on a fixed rate basis, directly contracted as such or thanks to interest rate hedges. It should be noted that, despite interest rates rising across the market in relation to last financing cycle, our average cost of financing at the end of December remained low, at approximately 2.7%.



4.8. Share performance

Twenty twenty-five began with cautious optimism, supported by slowing inflation, resilient growth and expectations of interest rate cuts, all of which underpinned rising share prices. The new U.S. administration placed trade policy at the heart of the international agenda, increasing market volatility and sensibility to announcements of tariffs, regulatory changes and industrial policy initiatives. In April, the announcement by the United States of a large scale array of customs tariffs represented a major shift in its trade policy, triggering significant adjustments in markets and increasing economic uncertainty around the world. Even so, the global economy proved sufficiently resilient to cushion the adverse effects of this new scenario.

Continued uncertainty, the weakness of the dollar against the euro and interest rate cuts in the Euro Zone and the US significantly drove up the prices of safe haven assets, such as gold and silver, reflecting the succession of political, fiscal and geopolitical shocks. As a result, 2025 emerged more clearly as a year of great volatility, in which market performance was less influenced by structural tendencies and forced economic actors to adapt their strategies to this new global paradigm. In this context, response capability and resilience were established as key differentiators in a deeply unstable environment.

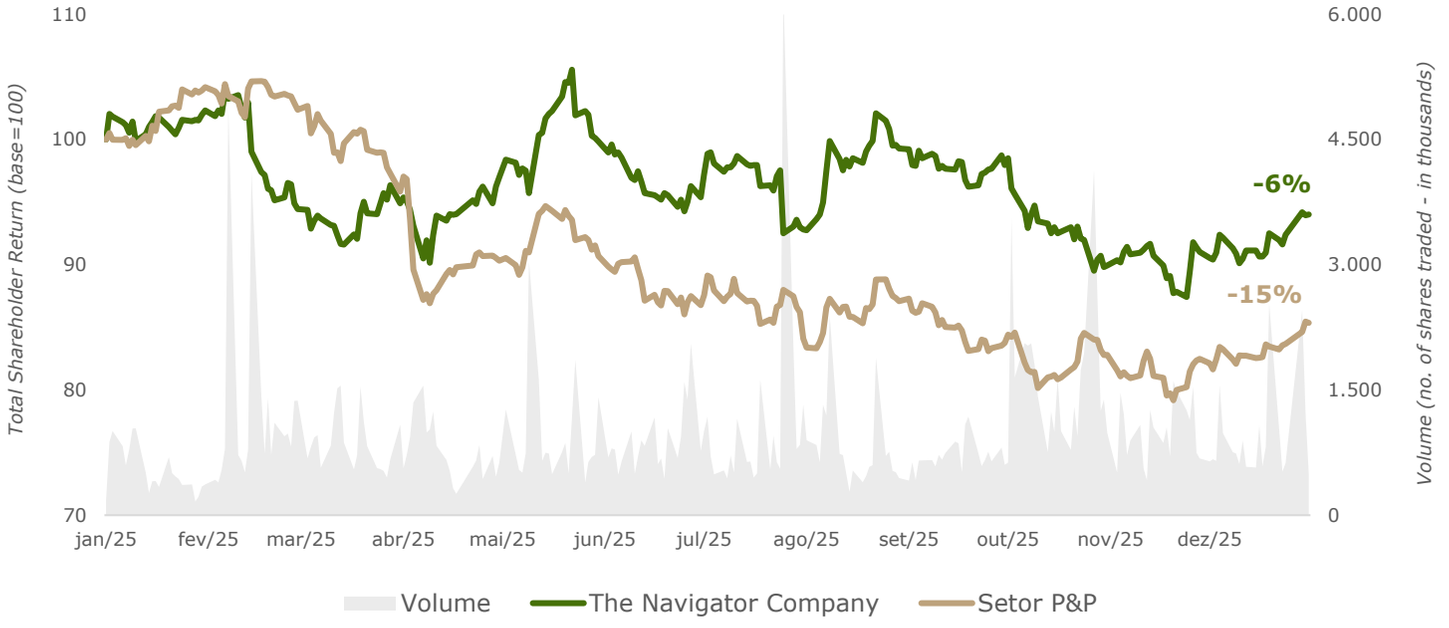
The share price performance of Pulp and Paper sector companies was significantly penalised this year, in particular over the last nine months, hit hard by the steep drop in pulp prices. After gains in the 1st quarter, the main benchmark indexes showed an abrupt adjustment, severely affecting the course of share prices. The year ended with most shares in the sector's companies presenting negative returns.

Navigator's total shareholder return (TSR) in 2025 was -6.0%. Despite the negative figure, Navigator again outperformed the Pulp and Paper (P&P) sector average in a particularly challenging year, reflecting strategic differentiation in the market and its sound dividends policy, which continues to enjoy investor confidence.

Navigator shares were down overall by 12.5% in 2025, closing the year at € 3.14 per share. The share price bottomed out at €2.920 in late November, and peaked at €3.664 on 2 January. Market activity remained fairly healthy, with an average daily trading volume of 958,564 shares, corresponding to average daily turnover of €3.1 million.

The **annual general meeting** was held on 29 May 2025 and approved **distribution of dividends of €175 million**, equivalent to a gross dividend of €0.24606/share. This was paid in two stages: an interim dividend of €0.14061/share was distributed on 14 January and the remainder, €0.10545/share, was paid on 1 July.

Total Shareholder Return *(vs. P&P sector)*



1. **P&P Sector** comprises a selection of 21 major companies in the Pulp and Paper sector, operating in Navigator's business area, including Pulp, Printing and writing paper, Tissue, Packaging and Energy.

At present, Navigator shares are held by approximately 80 investment funds with an ESG strategy, which incorporate environmental and social performance as well as corporate governance considerations into their investment decisions. In addition, Navigator is included in around 30 equity indices.

Navigator was again classified by Sustainalytics as a low-risk company for investors, maintaining its status as a "2025 ESG Industry Top-Rated Company" and reasserting its leadership in the forestry and paper sector. Placing it in the prestigious global list of 2025 ESG Top-Rated Companies, this recent assessment consolidates Navigator's position as one of the world's best companies in terms of environmental, social and governance (ESG) practices.

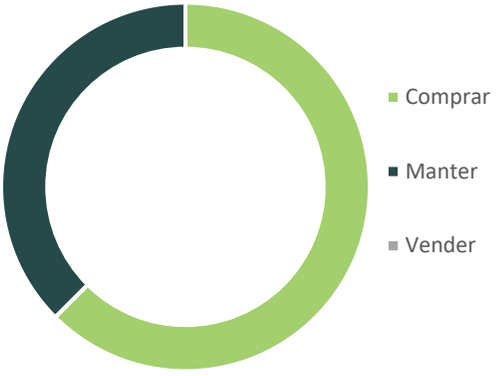
In 2025, Navigator obtained the top score of "A" on the CDP Climate Change and CDP Forests questionnaires for the last year, securing it a place on the prestigious "A List" for Climate and for Forests, and consequently its coveted leadership status. This assessment by CDP (Disclosure Insight Action) provides international recognition of Navigator's commitment and good practices in relation to risk management and deforestation.

Navigator also achieved an "A" rating from the MSCI ESG Ratings assessment (2025).

Navigator's ESG ratings and excellent rankings are important facts that reflect its ongoing efforts to integrate sustainability as a priority in its business model, demonstrating its capacity to anticipate and manage ESG risks in the conduct of its operations.

The average target price assigned by the analysts following the share, at the end of the year, was € 4.32, approximately 38% above the closing price (3.14 euros), with five Buy recommendations and three Keep recommendations.

Analysts' Recommendations in 2025



For information on Navigator's capital structure, please see the Corporate Governance Report in this Annual Report.

4.9. Contribution to State tax revenues

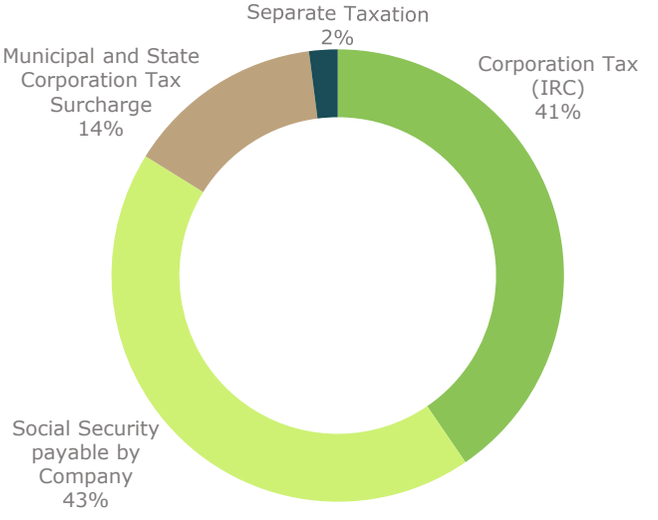
In the course of the Navigator Group's business, its component companies are subject to a large number of taxes, charges and contributions, making the Group a major contributor to State revenues in Portugal, helping the country to achieve its welfare and development objectives. The tax policy therefore has a significant impact on the business fabric, affecting all of the Group's value chain.

For this reason, the Navigator Group has a tax policy aligned with the Group's business development strategy, defined in accordance with the economic substance of its business and designed to ensure full compliance, by Group entities, with their tax obligations, in all the jurisdictions in which they carry on their business, seeking to comply fully with the spirit and letter of the applicable legislation.

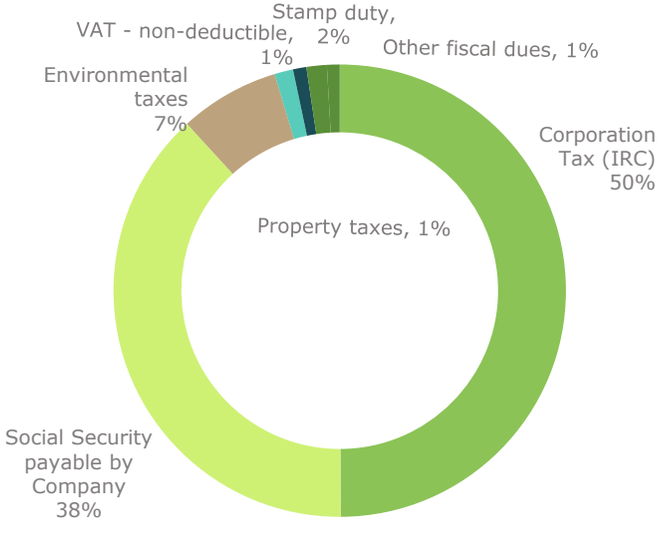
Aware of its role in Portugal's industrial and business fabric, and because of the vital importance of transparency in dealings with shareholders, the Navigator Group has sought in recent years to calculate its "tax footprint", identifying the volume of tax revenues obtained from its business operations and the taxes it collects and administers on behalf of the State and other parties, thereby contributing on this dual basis to the State's tax revenues.

As illustrated in the "Taxes paid" graph, the Group footed a total tax bill in 2025 (including more than 20 different taxes, contributions and charges) of €64 million (2024: €124 million), equivalent to an effective tax burden of 36.17% in 2025 (2024: 35.22%) on pre-tax profits. This tax burden consisted primarily of Corporation Tax (IRC), including surcharges (Municipal and State), Autonomous (flat-rate) Taxation (TA) and Social Security contributions, the last two of which totalled €32 million (2024: €93 million) and €24 million (2024: €23 million), respectively.

Main taxes paid



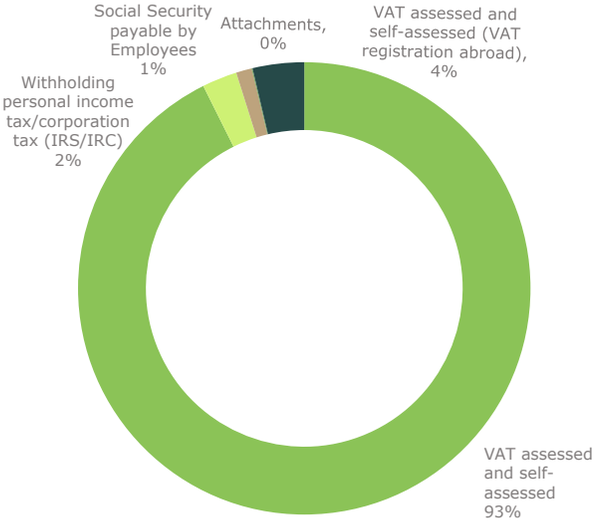
Total tax paid



Taxes paid include fairly substantial environmental taxes, totalling 5 million euros. These include the Petroleum Products Tax, Water Resources Charge, Public Maritime Domain Charge, Waste Management Charge, Special Consumption Tax (IEC) on electricity, Extraordinary Contribution on the Energy Sector (CESE), Single Road Tax (IUC) and CO_2 licenses, on which the outlay was stable in relation to the previous year (2024: 5 million), with the need to acquire licenses unchanged. This also demonstrates the fiscal contribution to the pursuit of sustainability goals, in line with the Group's policy. Accordingly, the size of the Group's tax bill again shows that its contribution is already high, meaning that the creation of new charges or financial contributions in future will clearly result in double taxation and a heavy tax burden for the Group, the consequence of which will be to limit Navigator's capacity to invest in new, more sustainable projects, as we have been doing.

In taxes levied by the State, Navigator as a whole paid out, in 2025, a sum of 1048 million euros (2024: €1158 million), with VAT once again the single largest contributor to this total (2025: €971 million vs. 2024: €1064 million), pointing to the Group's collaboration in collecting tax revenues for the Portuguese State. It should be noted that Navigator is not remunerated by the State for collecting this tax, in contrast to what happens in other jurisdictions, and even to the situation in Portugal for other economic operators, which are remunerated by the tax authority (e.g. attachments made on the tax authority's request), meaning that Navigator bears in full the costs of levying these taxes on the State's behalf.

Taxes collected



Mention should also be made of the VAT assessed and self-assessed by Navigator in other jurisdictions where it is registered for VAT purposes outside Portugal, where it collected an additional total of €39 million in VAT (2024: €59 million) for the respective state authorities.

VAT collected for other States

Figures in Euros

Country	2025	2024
Germany	12 891 944	17 181 032
Poland	12 429 957	17 223 814
Netherlands	7 966 299	16 948 429
United Kingdom	780 393	2 325 176
France	1 485 894	1 798 043
Spain	2 423 032	2 526 286
Switzerland	0	-75
Italy	574 682	815 334
Total	**38 552 201**	**58 818 038**

The Group also collects €11.7 million in Social Security contributions payable by its Employees (2024: €10.9 million) and €26 million in income tax (IRS) deducted at source (2024: €24 million), essentially on salaries paid to its Employees. The *labour tax rate* for 2025 stood at 35.13% (2024: 16.16%), and the variation was essentially due to the reduction in the Group's consolidated profits, in particular those of Navigator Tissue UK This indicator is calculated as the ratio between taxes levied on labour (Social Security contributions payable by the company and the worker, and IRS deducted from employees' pay) and pre-tax profits.

In terms of the geographical distribution within Portugal of **taxes charged on a territorial basis** (municipal surcharge, Municipal Property Tax, Municipal Conveyance Tax and municipal charges), the Group has the largest tax bill in the regions of Setúbal, Figueira da Foz, Aveiro and Vila Velha de Ródão, where it pays local taxes of €2.2 million, €1 million, €0.4 million and €0.4 million, respectively.

Worldwide, the Group paid out a total of € 71 million in Corporate Income Tax (CIT) in 2024, determined on a cash flow basis. The following table provides a geographical breakdown of corporate income tax paid by jurisdiction/country:

Jurisdiction	Accounting result in 2023	Corporation Tax paid in 2024	Share of Corporation Tax paid in 2024	Accounting result in 2022	Corporation Tax paid in 2023	Share of Corporation Tax paid in 2023
Figures in Euros						
Spain	18 528 462	7 752 091	10.77%	3 397 530	4 283 482	2.62%
Netherlands	52 402	12 089	0.02%	77 631	14 239	0.01%
Portugal	556 007 836	59 738 301	83.02%	499 827 076	157 819 034	96.57%
France	4 039 752	33 598	0.05%	109 464	54 649	0.03%
Germany	38 347	0	0.00%	189 360	65 200	0.04%
Austria	39 059	10 435	0.01%	40 593	4 268	0.00%
United Arab Emirates	3 780	0	0.00%	3 940	0	0.00%
United States	5 217 729	2 502 040	3.48%	67 239 990	479 402	0.29%
Italy	82 395	28 949	0.04%	88 319	36 424	0.02%
Morocco	17 174	0	0.00%	18 933	2 596	0.00%
Mexico	9 047	451 936	0.63%	18 747	12 472	0.01%
Poland	14 855	0	0.00%	14 926	4 667	0.00%
United Kingdom	570 831	595 468	0.83%	308 163	137 493	0.08%
Russia	0	0	0.00%	0	0	0.00%
Turkey	11 599	750 826	1.04%	17 236	1 857	0.00%
Egypt	6 445	75 338	0.10%	8 951	887	
Ireland	2 303 891	3 171	0.00%	6 228	498 941	0.31%
South Africa	-6 056 387	4 515	0.01%	0	0	0.00%
Nigeria	-130 251	0	0.00%	0	0	0.00%
Mozambique	0	0	0.00%	-13 713 375	1 447	0.00%
Total	**580 756 965**	**71 958 757**	**100.00%**	**557 653 711**	**163 417 057**	**100.00%**

In the context of compliance with its country by country tax reporting obligations, it may be seen that, in 2023, the Group paid 83% of its global corporate income tax burden in Portugal (2023: 97.00%; 2022: 97.00%; 2021: 78.87%; 2020: 80.92%; 2019: 95.95%; 2018: 92.93%; 2017: 93.78%), in the 19 jurisdictions (2023: 19; 2022: 17; 2021:18; 2020 and 2019: 16; 2018: 18; 2017:17) where the Group is established, its tax payments represented the following percentages of global corporation tax: 11.72% in Europe, 1.15% in Africa & Middle East and 4.11% in America.

Lastly, the tax footprint report is of special importance to the Group in its efforts to computerise its tax function, with a view to the reliability of fiscal information for compliance with tax reporting obligations, and insofar as it brings together and analyses the main indicators for the many different taxes paid and collected on behalf of the State, and the Group's decisive contribution to public revenues in Portugal.

4.10. The Navigator Group's tax policy

The Navigator Group fulfils the duties of corporate citizenship by complying with its obligation to create value and finance the general functions of the states where its carries on its business, by paying taxes, contributions, charges and other levies payable under the law, helping to promote the sustainable economic and social development of these countries.

The Navigator Group's tax policy is intended to ensure full compliance, by the entities making up the Group, of their tax obligations in all the jurisdictions in which they carry on their business, seeking to comply in full with the spirit and letter of the applicable legislation.

To this end, the Navigator Group relies on its internal specialists and external consultants (where necessary) to ensure that the taxation law applicable to its business and transactions is interpreted appropriately and prudently, and it also seeks binding information from the tax authorities, where admissible and opportune, in order to ensure compliance with its tax obligations, in a spirit of collaboration and in its pro-active endeavours to minimise risks and possible tax contingencies.

The Navigator Group's tax policy is aligned with the group's business development strategy, meaning that the policy reflects the economic substance of its activities. For this reason, the Group's transactions are treated for tax purposes in keeping with its business activities, and the fiscal implications of those transactions are just one of many economic factors to be considered in management decisions at the Navigator Group.

Obviously, like any other business cost, the Navigator Group is obliged to manage its tax expenditure in a financially responsible manner for the Company and for its Shareholders. For this reason, under its tax policy, the Navigator Group makes use of the tax benefits and incentives for which it is eligible on the tax legislation of the countries where it carries on its business and which are appropriate to that business, in view of its economic substance.

In addition, in transactions with related entities, the rules, OECD guidelines and international best practices in relation to transfer pricing are considered when deciding on the terms and conditions of these intra-group transactions.

The Navigator Group also takes active steps to establish a relationship based on cooperation with the tax authorities of the states where it carries on its business, in order to ensure it complies with tax legislation. This also entails providing the information and mandatory documents required by these tax authorities, in order to ensure that it complies with its own obligations and also that the economic operators interacting with the Navigator Group likewise comply with their respective tax obligations.

Importance is also attached to appropriate and effective disclosure of the Navigator Group's tax policy, as well as of its tax footprint, providing an annual breakdown of its tax bill and of the taxes that it collects and administers on behalf of the State or other parties, thereby contributing on two fronts to the State’s fiscal revenues and the payments made to public authorities.

Lastly, the Navigator Group develops and complies with internal procedures for appropriate and regular oversight of its tax practices and review of its tax policy, with the involvement of its corporate boards, in order to minimise the potential financial and reputational risks involved in decision-making on taxation matters.

5. Non-Financial Statement

Preliminary note

The Corporate Sustainability Reporting Directive (CSRD)[25] requires the disclosure of information on sustainability, in accordance with European reporting standards, with reference to the period starting 1 January 2024.

The CSRD laid down that Member States should transpose its provisions by 6 July 2024, and it is applicable to companies included within the terms resulting from its transposition into the respective national legal systems.

The process of transposing this Directive into Portuguese law was not concluded by that date, nor by the end of 2024 and, to the best of our knowledge, it remains under consideration by the competent authorities; as a result, by 20 March 2026 it has still not taken effect.

Companies subject to the CSRD, such as Navigator, are already included under the Non-Financial Reporting Directive (NFRD), and the CSRD represents a very significant change in sustainability reporting, requiring compliance with the more exacting criteria of the European Sustainability Reporting Standards (ESRS)[26].

In view of the failure to transpose the CSRD, the Portuguese Securities Market Commission (CMVM) issued a recommendation on 9 December 2024 to the effect that companies subject to its supervision and which the new duty would apply as from 1 January 2025 should make every effort to comply with the requirements of the Directive in question, so as to bring greater continuity, adaptability, transparency and comparability to the sustainability information disclosed, aligning themselves with its objectives..

In its annual circular in 2025, the CMVM subsequently announced that, in view of the legal context described, it will take a gradual approach, seeking above all to promote gradual adaptation by Issuers to the requirements which will follow from transposition of the CSRD.

Accordingly, when drawing up this report in line with the recommendations, The Navigator Company has complied, voluntarily, with the rules established in the CSRD, where and to the extent to which it was able to ensure full compliance with the respective provisions, considering the failure to transpose the directive, as described, within the deadlines and period indicated.

[25] Directive (EU) 2022/2464 of the European Parliament and the Council, of 14 December 2022, amending Regulation (EU) 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting.

[26] Delegated Regulation (EU) 2023/2772.

5.1. ESRS 2: General disclosures

5.1.1. Basis of preparation

5.1.1.1. General basis for preparation of Non-Financial Statement (BP-1)

Scope of consolidation

The Non-Financial Statement has been drawn up on a consolidated basis, and the scope of consolidation is the same as for the Financial Statements. There are affiliates included in the scope of consolidation which are exempt from the obligation to submit individual or consolidated sustainability reports[27]. Encompasses information and data aligned with the calendar year of 2025, covering the period from 1 January to 31 December. For disclosures relating to E1-6 Gross Scopes 1, 2 and 4 emissions of greenhouse gases (GHG) and total GHG emissions, the scope of consolidation was determined on the basis of operational control. [ESRS 2.5a | ESRS 2.5b i| ESRS 2.5b ii]

The company has not invoked the exemption established in Articles 19-A.3 and 29-A.3, of Directive 2013/34/UE, on the disclosure of imminent facts or matters under negotiation for companies established in a Member State of the EU. [ESRS 2.5e]

Value chain

In keeping with the double materiality principle, relevant information on the value chain is included, both upstream and downstream, whenever necessary for an understanding of Navigator's impacts, risks and opportunities and to point to compliance with the qualitative characteristics defined in the Corporate Sustainability Reporting Directive (CSRD). In keeping with this, commitments and specific actions have been incorporated to ensure sustainable practices at all stages of our operations. These commitments may be consulted in the 2030 Roadmap (Chap. 3.4.4). [ESRS 2.5c]

Intellectual property, know-how or results of innovation

Navigator has not used the option of omitting information about intellectual property, know-how or results of innovation [ESRS 2.5d].

External verification

The information contained in the Non-Financial Statement has been verified by KPMG & Associados - Sociedade de Revisores Oficiais de Contas, S.A. This firm has prepared an independent limited reliability assurance report (Chap. 9.4).

[27] Navigator Brands, S.A.; Navigator Parques Industriais, S.A.; Navigator Paper Figueira, S.A.; Empremédia - Corretores de Seguros, S.A.; Empremedia, DAC; Empremedia RE, DAC; RAIZ - Instituto de Investigação da Floresta e Papel; Enerpulp – Cogeração Energética de Pasta, S.A.; Navigator Pulp Figueira, S.A.; Ema Cacia - Engenharia e Manutenção Industrial, ACE; Ema Setúbal - Engenharia e Manutenção Industrial, ACE; Ema Figueira da Foz - Engenharia e Manutenção Industrial, ACE; Navigator Pulp Setúbal, S.A.; Navigator Pulp Aveiro, S.A.; Navigator Fiber Solutions, S.A.; Navigator Tissue Aveiro, S.A.; Navigator Tissue Ródão, S.A.; Navigator Tissue Ejea, SL; Navigator Tissue France, EURL; Portucel Moçambique - Sociedade de Desenvolvimento Florestal e Industrial, Lda; Navigator Forest Portugal, S.A.; Gavião - Sociedade de Caça e Turismo, S.A.; Afocelca - Agrupamento Complementar de Empresas para Proteção Contra Incêndios, ACE; Viveiros Aliança - Empresa Produtora de Plantas, S.A.; Greenbloom, A.C.E.; Bosques do Atlântico, SL; Navigator Africa, SRL; Navigator Paper Setúbal, S.A.; Navigator North America Inc.; Navigator Afrique du Nord; Navigator España, S.A.; Navigator Netherlands, BV; Navigator France, EURL; Navigator Paper Company UK, Ltd; Navigator Holding Tissue UK, Ltd; Navigator Corporate UK, Ltd; Navigator Tissue UK, Ltd; LTC Parent Ltd; Leicester Tissue Company Ltd; John Dale (Holdings) Ltd; John Dale, Ltd; Severn Delta, Ltd; Navigator Italia, SRL; Navigator Deutschland, GmbH; Navigator Paper Austria, GmbH; Navigator Paper Poland SP Z.O.O; Navigator Eurasia; Navigator Paper Mexico; Navigator Middle East Trading DMCC; Navigator Egypt, ELLC; Navigator Paper Southern Africa; Portucel Nigeria Limited; Navigator Green Fuels Setúbal, S.A.; Navigator Green Fuels Figueira da Foz, S.A.; Navigator Abastecimento de Madeira, ACE; The Navigator Company S.A. – Sucursal en España; Pulpchem Logistics, ACE.

5.1.1.2. Disclosures in relation to specific circumstances (BP-2)

Time horizons

Navigator has selected time horizons consistent with the ESRS definitions for impacts, risks and opportunities, except for climate risks. The time horizons are: short term (<1 year), medium term (1 to 5 years) and long term (>5 years). In the case of climate risks, the time horizons are aligned with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD): medium term (up to 2035) and long term (up to 2050). [ESRS 2.9a]

Value chain, sources of estimation and outcome uncertainty

The metrics/indicators/KPIs which include estimated upstream and/or downstream value chain data, using indirect sources, are scope 3 emissions (E1-6). Calculation of this indicator uses estimates based on the best available information, albeit subject to uncertainty, in particular emissions associated with the transformation of intermediate products (Category 10) and the end of life of products (Category 12) Scope 3 emissions are also calculated on the basis of emission factors from credible data bases[28] which, even so, may not best represent the reality of Navigator's value chain. [ESRS 2.10]

Additionally, estimates are used in the case of disclosures on: estimated financial impact of climate change (E1.SBM-3); water withdrawal in Mozambique (E3-4); hours worked for non-employees (S1-14); and monetary value of donations in kind (specific disclosure by entity).

The metrics disclosed in the Non-Financial Statement have not been subject to validation by an external entity other than the report auditor [ESRS 2.77b], with the exception of scope 1 emissions, relating to the European Emissions Trading Scheme (EETS), which are subject each year to verification by an independent entity accredited by the Instituto Português de Acreditação (IPAC), as required by Regulation (EU) 2018/2067 and Decree-Law 12/2020, as amended by Decree-Law 101/2024, which transposes Directive (EU) 2023/959. For further information, please see sub-chapter 9.4. [ESRS 2.11]

Comparative information

For the metrics, Navigator presents comparative information relating to the previous year, given that 2024 was the first ESRS reporting year.

In general, only for the targets established, when available/applicable, fuller historical data is presented (reporting year and two historical years).

Changes in preparation or presentation of sustainability information

Changes in the preparation and presentation of sustainability information in comparison with the previous reference period, where applicable, are identified jointly with the respective information. [ESRS 2.13 | ESRS 2.80i] It should be noted that, in environmental indicators, as in previous year, scope 1 emissions have been revised, incorporating the changes in EETS (European Emissions Trading Scheme) verification and information not available at the time of publication of the 2024 Annual Report. These changes have a materiality of less than 0.3%. It should be noted that, in the case of social Indicators, the data relating to the number permanent and temporary Employees (indicator S1-6), the number of workers covered by the undertaking's health and

[28] Ecoinvent, CEPI and Eurostat.

safety management system (S1-14), the percentage of Employees entitled to family care leave and actually taking it (S1-15), Compensation Metrics (S1-16) relating to 2024 have been adjusted. [ESRS 2.13]

Reporting errors in prior periods

In relation to the identification of material errors in prior periods, if applicable, these errors are duly identified and described jointly with the respective information. No material errors were found in previous periods. [ESRS 2.14]

Disclosures stemming from local legislation or generally accepted sustainability reporting pronouncements

The Non-Financial Statement seeks to consolidate and reflect or approach and commitment to sustainability matters. It has been drawn up in accordance with (see "Preliminary note" at the start of this chapter): (1) the European Sustainability Reporting Standards (ESRS); and (2) the Non-Financial Reporting Directive, transposed into Portuguese law by Decree-Law 89/2017, of 28 July. Navigator also reports with reference to the GRI (Global Reporting Initiative) Standards, presenting in Chap. 8 a summary of historical data for various metrics. [ESRS 2.15]

Incorporation by reference

Navigator has adopted the "Incorporation by reference" approach to improve the narrative structure of the report and has included certain disclosure requirements over the course of the annual report and in the Non-Financial Statement itself. The list of disclosure requirements incorporated by reference and their location in this report is contained in Chap. 9.1.1. [ESRS 2.16]

5.1.2. Governance

The information on the Statement on due diligence (GOV-4) is contained in chapter 9.1.1. [ESRS 2.30]

5.1.2.1. The role of the administrative, management and supervisory bodies (GOV-1)

Description of bodies

The following information is incorporated by reference to other parts of the management report and documents:

- Disclosure of the composition and diversity of the administrative, management and supervisory bodies (ESRS 2.21a/c/d/e): Chap. 3.2 Governance Model in this report and in sections 11, 17, 21, 31 and 39 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance;

- Representation of employees and other workers on the company's administrative, management and supervisory bodies (ESRS 2.21b): Chap. 3.2 Governance Model in this report and in sections 11, 17, 21, 31 and 39 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance;

- Disclosure of the identity of the members of administrative, management and supervisory bodies (ESRS 2.22a): sections 11, 17, 21, 31 and 39 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance;

Sustainability governance

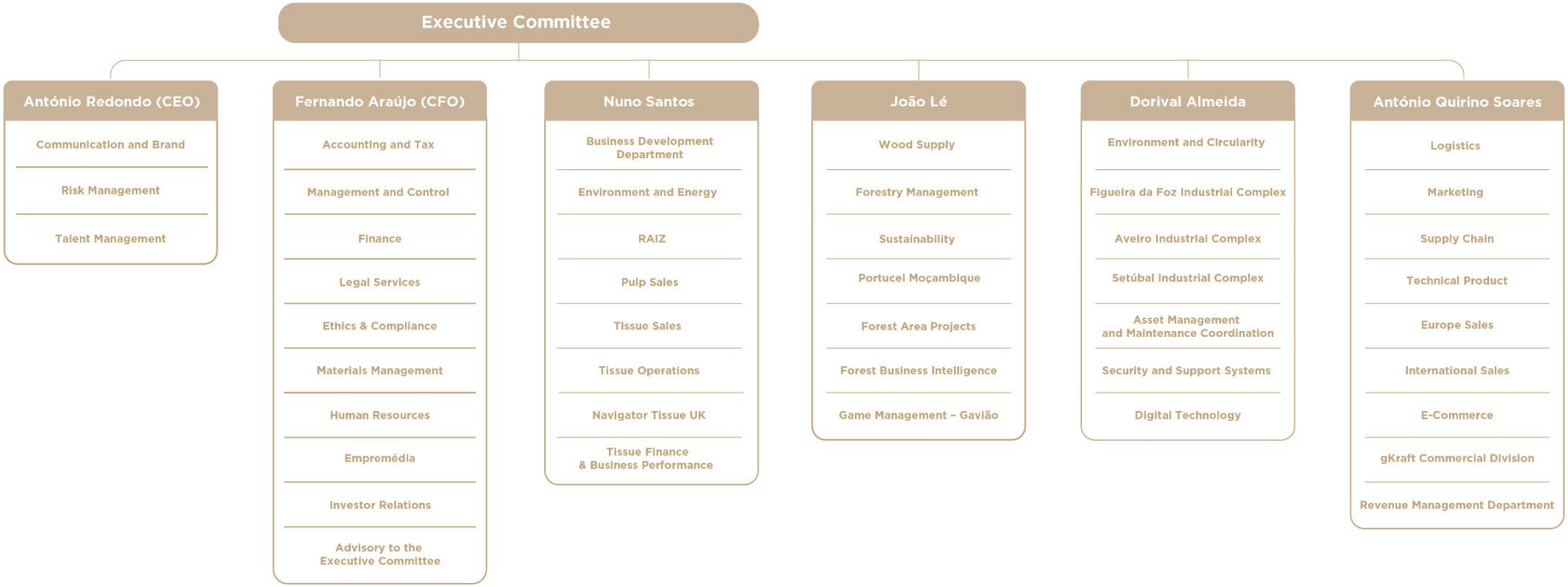
Sustainability governance is supported by a number of different bodies and corporate committees, each with clearly defined functions with regard to sustainability management. Powers to decide on Navigator's mission, strategy, policies and targets (including as regards sustainable development) lie with the **Board of Directors**.

The design of our 2030 Responsible Management Agenda (Chap. 3.4.2), published for the first time in 2021, was subject to strategic reflection in 2024, in order to conciliate it with the review of the double materiality analysis, in accordance with the ESRS standards. This reflection was presented and approved by the Executive Committee and the commitments and priority plans established in the 2030 Agenda and Roadmap were adjusted so as to align them with international trends and the social and environmental challenges facing Navigator's business (Cap. 3.4.1). [ESRS 2.22b/d]

In 2025, the **governance model for management of sustainability reporting** was strengthened, evolving from a linear structure based in direct key users to a model with three complementary levels - material topic management centre: (i) Steering Officers, comprising managers from various sectors, responsible for steering and validating qualitative information and supporting policy design and target setting; (ii) Focal Points, members of the Sustainability Department, responsible for ensuring alignment with ESRS standards and acting as focal point for coordination; and (iii) Key Users, representing different departments, responsible for collecting and validating quantitative and qualitative data.

In this context, the **Executive Committee** remains responsible for overall oversight, delegating implementation of the **2030 Roadmap** targets and initiatives to the departments, which constitutes a strategic tool for implementing the Company’s 2030 Responsible Management Agenda. This work is overseen by the new governance model, through coordination between the Steerings, Focal Points and the network of Key Users, ensuring that execution of the roadmap is consistent with the requirements of sustainability reporting. [ESRS 2.22c]

This model makes for robust systematic monitoring of Navigator's performance in relation to the goals set, permitting adjustments to be made whenever necessary. All relevant changes are submitted for the approval of the Executive Committee and, once validated, are disclosed transparently in the Annual Report. [ESRS 2.22c/d]



The Sustainability Department is overseen by the executive director responsible for sustainability issues, enabling coordination with other Navigator departments and also with the Sustainability Forum in order to address specific issues. [ESRS 2.22c]

The **Sustainability Forum** is one of the main committees providing support to the Board of Directors. Headed by the Chief Executive Officer, this structure is supported by a consolidated model with internal and external members, including leading figures linked to major Stakeholder groups, such as members of academe, NGOs, industrial associations and forestry producers' organizations. [ESRS 2.22c]

The Sustainability Forum is an arena for dialogue and meets twice a year. One of the annual sessions is internal, attended by the Forum's Permanent Members (internal and external) and the second session adopts an open model, with participation by a wide-ranging group of Stakeholders (Cap. 3.4.5). These sessions have often taken on a regional flavour, seeking to reach out to local Communities and different types of Stakeholders, and to benefit from the cooperation between Navigator and the various municipalities where we have operations, as well as to foster collaboration with leading figures in our sphere of activity. [ESRS 2.22c]

Participation by external Stakeholders is also a feature of the **Environmental Council**, which consists of four members, all of them leading academics and independent figures, of respected technical and scientific expertise, especially in the environmental areas relevant to Navigator's business. [ESRS 2.22c]

The **Ethics and Integrity Committee** comprises three prestigious independent figures, appointed by the Board of Directors, who select their own chairman and are charged with monitoring the rules established in the Code of Ethics and Good Conduct. [ESRS 2.22c/ G1.5a]

In addition, attention is drawn to the role of the **risk management** structures in implementing the respective policies and in managing ESG risks (Chap.3.3) [ESRS 2.22c]

There are also the **Community Monitoring Committees** (Chap. 5.3.3) – in Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão – which include representatives of municipal authorities, local bodies, NGOs and universities, among others. These committees reflect a policy of openness and sharing information about the activities of the various industrial complexes, as well as seeking to learn about our Partners' expectations and needs. [ESRS 2.22c]

This governance model enables engagement across various Group structures on sustainability matters, and to incorporate external perspectives from significant Stakeholders into efforts to honour our commitment to create value sustainably (understood as a simultaneous quest for economic prosperity, environmental responsibility and a fair society) and to actively encourage our Partners and Stakeholders to join us in pursuing these goals. [ESRS 2.22c]

The following information is incorporated by reference to other parts of the management report and documents:

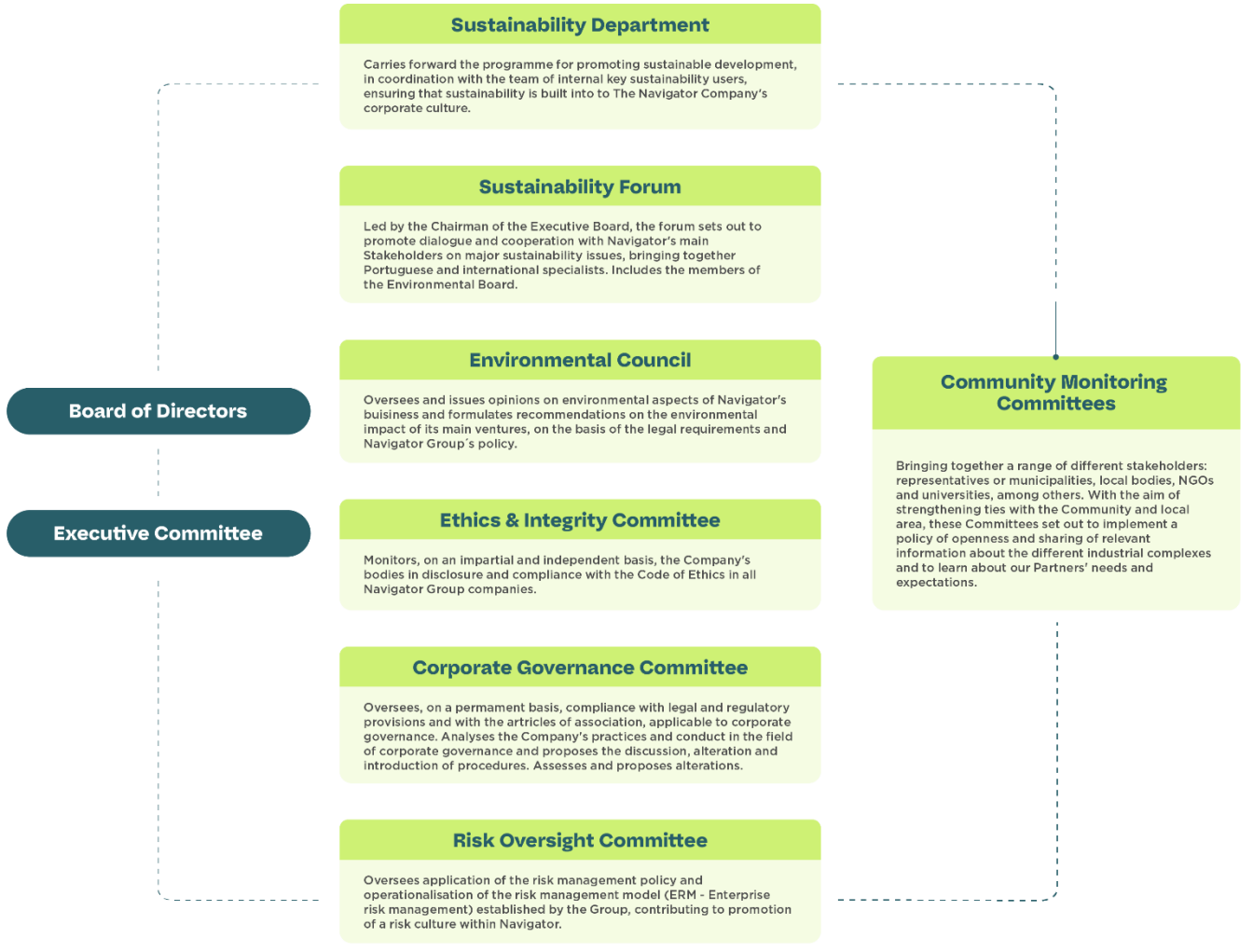
- Functions and responsibilities of administrative, management and supervisory bodies in overseeing risks (ESRS 2.22a/b/c): Chap. 3.3 Risk management in this report and in sections 50 to 51 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance.

- Role of administrative, management and supervisory bodies with regard to business conduct (ESRS G1.5a): chap. 3.2 Governance Model and sections 11-38, Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Corporate Governance | B. Statutory Bodies and Committees | II. Management and supervision | III. Audit

Expertise and skills

The members of the Board of Directors and the Executive Committee have powers and are responsible for decision-making processes relating to all sustainability issues. Internal departments report all matters relating to sustainability to the EB. Likewise, sustainability matters are discussed by the Environmental Board and the Sustainability Forum, which report to the Executive Committee and the Board of Directors. It may also be noted that, in connection with ESG (Environmental, Social and Governance)

requirements, a training programme was designed and implemented in 2022 and 2023, by a specialist external firm, aimed at the executive directors and a number of other senior managers, in order to strengthen internal expertise in the organisation of these fields. The topics addressed included the dynamics of the international agenda and the response of institutions to climate and social challenges (2030 Agenda, the Paris Agreement and the European Union Green Deal), sustainable finance, Environmental Taxonomy, the Sustainable Finance Disclosure Regulation (SFDR), the Corporate Sustainability Reporting Directive (CSRD), double materiality, TCFD and the Sustainability Due Diligence Directive, which are directly or indirectly related to the IROs which have been formally identified. [ESRS 2.23a/b]



Structure

Corporate Boards and Committees

Sustainability Forum

Chair: António José Pereira Redondo (CEO)

General Secretary: Maria Teresa Aliu Presas (Member of the Board of Directors)

Internal Members: João Paulo Cabete Gonçalves Lé, José Fernando Morais Carreira de Araújo, Dorival Almeida, Nuno Miguel Moreira de Araújo dos Santos, António Quirino Soares and Vítor Paranhos Pereira

External Members: Ana Miranda, Assunção Cristas, Filipe Santos, Filipe Duarte Santos, Francisco Gomes Silva, Francisco Ferreira, Helena Freitas, José Júlio Norte, Luís Neves Silva, Margarida Tomé, Maria da Conceição Cunha, Rosário Alves and Rita Nabeiro

Environmental Council

Chair: Maria da Conceição Cunha

Members: Ana Miranda, Margarida Tomé and Joaquim Poças Martins

Corporate Governance Committee

Chair: Ricardo Miguel dos Santos Pacheco Pires

Members: António José Pereira Redondo, António Pedro Gomes Paula Neto Alves and Rui Tiago Trindade Ramos Gouveia

Ethics & Integrity Committee

Chair: Henrique Reynaud Campos Trocado

Members: Jaime Alberto Marques Sennfelt Fernandes Falcão and Rui Tiago Trindade Ramos Gouveia

Risk Oversight Committee

Chair: António Redondo (Chief Executive Officer)

Members: Fernando Araújo (CFO), Gonçalo Duarte (Risk Management Division), Paula Guimarães (Sustainability Division), Ana Marques (Ethics & Compliance) and Alexandra Fernandes (Empremédia)

The following information is incorporated by reference to other parts of the management report and documents:

- Disclosures concerning the expertise of members of administrative, management and supervisory bodies in sustainability and business conduct matters (ESRS 2.23/ G1.5b): Chap. 3.2 Governance Model in this report and in sections 16 to 19 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance.

Board of Directors (administration and management bodies)

ESRS 2.21a and ESRS 2.21e		Number of Members	Percentage
	Executive	6	46.15%
	Non-executive	7	53.85%
	Independent	3	23.08%
ESRS 2.21d			
	Male	9	69.23%
	Female	4	30.77%
	Others	0	0%
	Not disclosed	0	0%
	Total	13	100%
	Gender diversity on Board of Directors (Index)		0.44

Supervision

The figures below refer only to the Audit Board.

ESRS 2.21a and ESRS 2.21e		Number of Members	Percentage
	Non-Independent	1	33.33%
	Independent	2	66.66%
ESRS 2.21d			
	Male	2	66.66%
	Female	1	33.33%
	Others	0	0%
	Not disclosed	0	0%
	Total	**3**	**100%**
	Gender diversity on Audit Board (Index)		0.5

5.1.2.2. Information provided on sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (GOV-2)

The following information is incorporated by reference to other documents:

- Information provided to bodies on IROs (ESRS 2.26a/b/AR6): sections 21, 24 and 25 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance.

The sustainability issues/IROs assessed by administrative, management and supervisory bodies, or by the relevant committees, during the reporting period, included: [ESRS 2.26c]

- Regulatory topics, such as presentation and monitoring of the project for implementation of the EUDR regulations and approval of Action Plans for the transitional and definitive period for implementation of the Carbon Border Adjustment Mechanism (CBAM).
- Planning of the two annual sessions, given over to the topics "Sustainability Forum: celebrating 10 years of sustainability governance at Navigator" (internal session) and "The business case for Sustainability in a changing world" (external session)
- Participation in sustainability events in connection with the invitation to WWF (Sustainable practices in farming) and to Kiwa Sativa (guest speaker in the Sustainable Innovation module of the Masters in Sustainability Management);
- Discussion of Sustainability Event for Clients and presentation of proposal for 2nd edition to be held in May 2025, with presentations on topics relating to Navigator's 2030 Agenda and the EUDR;
- Discussion of the possibility of establishing a partnership with the Sustainable Development Solutions Network (SDSN) Portugal and of supporting the 2nd Sustainable Development and Competitiveness Conference;
- Discussion of Semapa's Control and Risk Forum and analysis of the Risk Management Activities Schedule for 2025;
- Presentation of progress report on management of process waste;
- Approval of pilot project in partnership with Secil, for construction of a facility for granulation of fly ash with mortars in Pataias, to carry out representative trials in cement production of introducing the granulated mixture in the clinker cooler in Maceira;
- Presentation of methodology for calculation of carbon footprint of a product and communicating this to the market;
- Presentation of progress reports on several Green Fuel projects under way, in particular the eFuels projects for producing e-methanol from green hydrogen and biogenic CO_2, capture and reclamation of biogenic CO_2;
- Presentation of the Strategic Development and Financing Plan for the Navigator Forestry Producers' Club;
- In connection with the biodiversity conservation strategy, the cooperation agreement was renewed between Navigator Forest Portugal (NFP) and MONTIS - Associação para a Gestão e Conservação da Natureza;
- Presentation of phase 1 of Leiria Project, which sets out to build up NVG's forestry and technological expertise in relation to pine species with production potential in Portugal, acquiring know-how for a potential future forestation and wood supply chain for the company;
- Monitoring of the GROWING Project and respective initiatives;
- Creation of organisational structures in the Energy and Energy Transition Department (Energy Sector, Decarbonisation Sector and Green Fuels Sector) and in the Environment and Circularity Department (Environment in Mills and Transversal Environmental Coordination), and appointment of respective Sector managers;
- Creation of Ethics & Compliance sector, separate from the Legal and Public Affairs Department.
- Contributions for Employees attending Academic Training 2025;
- Presentation of Navigator Housing Support Programme;
- Review of Child Vouchers: Benefits plan 2025.

In connection with decarbonisation projects:

- Work started on construction and acquisition of plant for the project to install a biomass boiler in Vila Velha de Ródão.
- Acquisition of plant for the project to convert lime kiln 3 in Aveiro, to make it entirely independent of fossil fuels;

5.1.2.3. Integration of sustainability-related performance in incentive schemes (GOV-3)

The following information is incorporated by reference to other documents:

- Incentive schemes and remuneration policies linked to sustainability matters (ESRS 2.29a/b/c/e): sections 24-25 and 70 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance.

Assessment of the performance of each Executive director follows a structured internal process defined in the Remuneration Policy. The basic criteria for assessing the performance of Executive directors (in force for the 2023-2025 term of office) are defined in that policy, setting the variable remuneration component.

The annual variable remuneration is based on a target amount applicable to each Director and which is payable when their performance and that of the Company corresponds to expectations and pre-established goals. This target value is set after considering the general principles set out above - market, specific duties, the Company's situation -, with special attention being paid to comparable market situations in positions of equivalent importance.

Actual performance is assessed against expectations and goals, thereby defining the variation in relation to the target, on the basis of a series of quantitative and qualitative KPIs related to the performance of the Company (corresponding to the general business indicators, with a weighting of 65%) and that of the Executive director in question. These consist of Specific Goals – corresponding to the **proportion of the variable remuneration dependent on sustainability-related goals and/or impacts (20%)**, which include ESG KPIs such as, for instance, the findings of the annual Organisational climate study, reduction of CO_2 emissions, certified wood and consumption of water, energy and wood –, and Behavioural Indicators (15%). On the other hand, Non-executive directors and Members of the Audit Board only receive fixed remuneration, with no variable component, meaning there are no incentives linked to any factor. [ESRS 2.29a/b/c/e] [E1.GOV-3.13]

5.1.2.4. Risk management and internal controls over sustainability reporting (GOV-5).

Navigator's expansion into new geographical regions and business areas, combined with the wide variety of information systems in use, significantly adds to the complexity of the processes of collecting, harmonising and validating data. In order to achieve greater consistency, efficiency and internal accountability over the course of the process, a sustainability reporting governance model has been designed, as presented in the GOV-1 section. In addition, a pilot project is in progress for management of quantitative data, designed in line with this new governance structure. With these two initiatives our aim is to improve the reliability, integrity and auditability of information, reducing the risks of nonconformity.

In general, the Navigator Group's internal control system is based on the COSO (Committee of Sponsoring Organizations of the Treadway Commission) guidelines, ensuring the integrity and transparency of the internal processes. In order to strengthen the reliability of sustainability reporting, the Group has adopted the COSO – ICSR (Internal Control over Sustainability Reporting) guidelines. This retains the five fundamental components of the traditional internal control model, adjusted to the sustainability context, ensuring a structured and effective approach to risk management and the quality of the information disclosed [ESRS 2.36a/b]:

Control environment:

- Navigator promotes an organisational culture that attaches value to ethics and socio-environmental responsibility. The Group's Codes of Ethics and Good Conduct establish values, principles and rules of conduct to be observed within the organisation and in dealings with Shareholders, Suppliers, Clients and other Stakeholders, in their different aspects and forms.

- The Board of Directors is responsible for creating and maintaining an effective system of internal control and risk management. Responsibility for maintaining the internal control and risk management system in relation to sustainability reporting is delegated to the Executive Committee. The control environment is supported by its own governance structure, aligned with the 3-line model of the IIA (Institute of Internal Auditors), as described in sections 50-55, Corporate Governance Report | Part III. Internal control and risk management.

Risk assessment:

- The Navigator Group's risk management process is in line with internationally accepted best practices, models and frameworks for risk management, including COSO II - Integrated Framework for Enterprise Risk Management and ISO 31000, and is supported by the Risk Management Policy.

- The Group pro-actively identifies and analyses the risks that may affect the reliability and accuracy of its sustainability reporting This includes monitoring of factors such as changes to legislation and regulations, Stakeholder expectations and environmental impacts from its industrial activities.

- The Group has adopted an approach that integrates risk management with ESG topics, ensuring a connection between the double materiality exercise and the risk management model, so as to identify, assess and mitigate impacts and opportunities strategically.

Control activities:

- The Navigator Group's controls include policies, guidelines, procedures and organisational structures that ensure compliance with the Executive Committee’s instructions and mitigation of the risks associated with sustainability reporting.

- The minimum requirements for internal control are designed to prevent, detect and correct errors and irregularities in the collection, processing and disclosure of ESG information, and also to ensure data is traceable.

- These activities are implemented at all levels of the organisation and include approvals, authorisations, checks, reconciliations and segregation of duties.

Reporting and communication:

- The Group’s reporting and communication channels support the collection, processing and disclosure of sustainability reporting information, and there is continuous communication between the different levels of the organisation and external Stakeholders.

Monitoring and continuous improvement:

- Sustainability reporting is monitored by the Executive Committee and the Board of Directors, ensuring alignment with the Group's strategic objectives. Periodic assessments are conducted of the effectiveness of the internal control system in the context of sustainability reporting. On the basis of these assessments, corrective action is implemented with a view to continuous improvement of the quality and accuracy of the information disclosed.

In prioritising the risks related to sustainability reporting and in analysing their importance in relation to the organisation’s other risks, the assessment is carried out in the broader context of the Group’s main risks (see Chap. 3.3 Risk management), given that

they may add to or attenuate some of the main risks. This integrated approach ensures that material risks and opportunities are incorporated in Enterprise Risk Management, the Group's risk management tool. [ESRS 2.36c/d]

Navigator arranges for periodic reporting of the findings of its risk assessment and the respective internal controls to the administrative, management and supervisory bodies, through its governance model. The findings of the risk assessment are discussed, whenever justified, at meetings of the Risk Management Committee, held quarterly, and then presented at sessions of the Risk Management Board (six-monthly meetings), the Executive Committee (weekly meetings) and the Board of Directors (annual meetings). The Sustainability Forum (bi-annual meetings) and the Environmental Board also discuss significant issues related to sustainability (see Chap. 5.1.2 Governance). [ESRS 2.36e]

The following information is incorporated by reference to other parts of the management report and documents:

- Risk control and management (ESRS 2.36a/b): sections 50-55 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance.
- Main risks identified, together with respective mitigation strategies (ESRS 2.36c): Chap. 3.3 Risk management in this report and in section 53 of the Corporate Governance Report | Part I – Information on capital structure, organisation and corporate governance and section in this chapter on review of the double materiality analysis.

5.1.3. Strategy

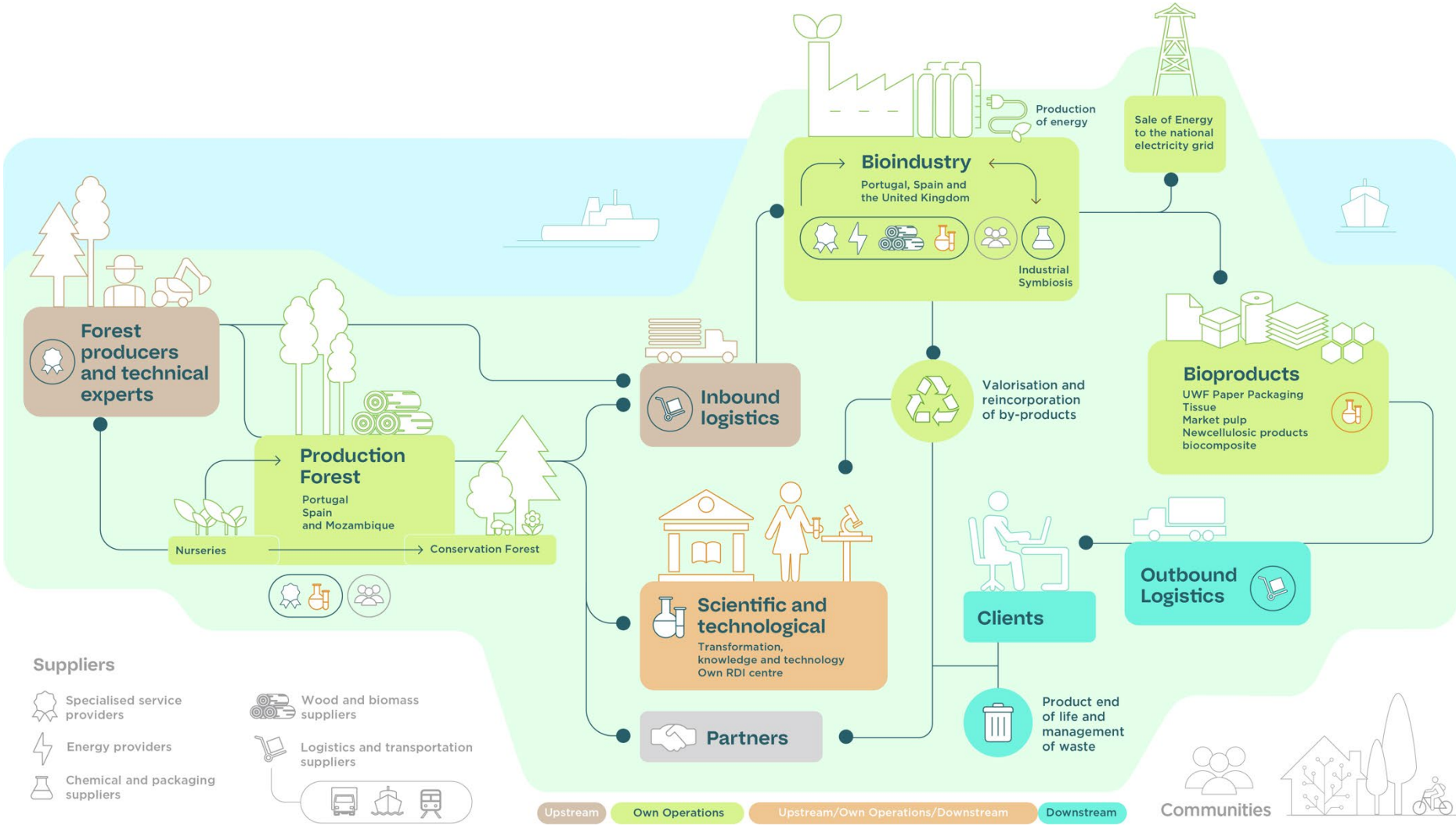
5.1.3.1. Strategy, business model and value chain (SBM-1)

The following information is incorporated by reference to other parts of the management report and other documents:

- Describe the significant groups of products offered and/or services provided by the company (ESRS 2.40a-i/ii): Chap. 2.2 Company Profile, Chap. 3.1 Business Strategy, Chap. 4 Business performance.
- Headcount of employees by geographical area/country (ESRS 2.40a-iii): Chap. 5.3.1.3.2 Characteristics of the Company's employees (S1-6).
- Company's sustainability goals in terms of groups of products and services, customer groups, geographical areas and Stakeholder relations (ESRS 2.40e): Chap. 2.2 Company Profile; Chap. 2.3 Creating sustainable value; Chap. 3.1 Business Strategy; Chap. 3.4.4 2030 Roadmap; Chap.. 3.4.5 Stakeholder Engagement.
- Assessment of current significant products and/or services and significant markets and groups of customers, in relation to its sustainability goals (ESRS 2.40f): Chap. 4 Business performance.
- Elements of company strategy that relate to sustainability matters (ESRS 2.40g): Chap. 3.1 Business strategy and Chap. 3.4 2030 Agenda and Roadmap, including sub-chapters 3.4.1 Global trends and challenges for Navigator, 3.4.2 2030 Agenda and 3.4.3 Contribution to SDGs.
- Exemption from disclosure of the information referred to in Article 18.1 a) of Directive 2013/34/EU (ESRS 2.41): note 2.1 on business segments in Financial Statements.
- Business model (ESRS 2.42 a/b): Chap. 2.2 Company Profile and chap. 3.1 Business strategy.

Business model and value chain

The figure below illustrates The Navigator Company's value chain, presenting the main upstream activities, in own operations and in downstream activities, as well as the connection to leading Suppliers, distribution channels and Customers. [ESRS 2.42c]



At Navigator we are responsible for developing forest-based products and solutions that promote sustainable development and social well-being. We have expanded beyond our traditional pulp and paper sector, acting as the engine of a new circular forest-based bioeconomy throughout the value chain. [ESRS 2.42]

We manage a total of approximately 139 000 hectares of woodlands, including production forests, and areas given over to wildlife conservation. In mainland Portugal, Navigator manages approximately 111 000 hectares, 100% certified under the FSC and PEFC systems (since 2007 and 2009, respectively). With a robust Forest Management Plan and scientific support from RAIZ, we promote innovative, preventive and adaptative silviculture practices, we boost the resilience of forests to climate change and we operate programmes to engage with Producers and Service Providers, in particular through concrete initiatives, such as the Navigator Forestry Producers Club and technical training in sustainable forestry management. [ESRS 2.42]

We have invested in creating innovative and distinctive products, in promoting a new generation of bioproducts, offering an alternative to fossil-based materials, and in developing potential new businesses, aligned with sustainable development, meaning that innovation and technology are important pillars of our business, ensuring the sustainability of our products and processes. These efforts are underpinned by a R&D ecosystem featuring RAIZ and our partnerships with universities, research centres and other industrial players, which enable us to co-create new forest-based biomaterials, biochemicals and biofuels, and to accelerate the transition to a low fossil carbon bioeconomy. [ESRS 2.42]

We produce pulp, printing and writing paper (our leading brands are Navigator, Pioneer, Inacopia and others) and Tissue (under the Amoos brand). We have also established ourselves in the packaging solutions sector, with our gKraft™ brand, keeping abreast of market trends and sustainability challenges. In this packaging segment, where our operations subdivides into macro-segments - FLEX, BAG, BOX and BioShield for applications in bags, flexible packaging and boxes, Navigator is helping to speed up the transition from single-use fossil plastic to the use of natural fibres, which are sustainable, recyclable and biodegradable. In tissue, we operate at eight production units, in Portugal, Spain and the United Kingdom, offering clients a full portfolio of private brand and mill brands products, with a growing focus on the At Home/Consumer segments. [ESRS 2.42]

We produce our energy in renewable biomass co-generation plants, integrated into the industrial complexes in Aveiro, Figueira da Foz and Setúbal. Use of this highly efficient technology makes it possible to supply steam and renewable electricity for production of pulp, paper and tissue, boosting the synergies at the industrial complexes. The power not consumed is injected into the national grid, contributing to the sustainability and decarbonisation of the country's energy system. At the Aveiro and Setúbal complexes, we also have two power plants dedicated to the sale of electricity, using sustainable waste forestry biomass as their energy source. The commitment to renewable energy also extends to photovoltaic solar technology for generating power. We have eight solar power facilities for in-house consumption. operating at its industrial complexes, nurseries and our RAIZ research centre. Added to these, two other facilities, in Ejea and Figueira da Foz, operate on a Power Purchase Agreement basis. In total, the 10 facilities represent rated capacity of 38 MWp, positioning us as the largest producer of solar power for internal consumption in an industrial setting in Portugal.

Lastly, the group also has two natural gas co-generation plants located on the industrial complexes in Figueira da Foz and Setúbal. The cogeneration plant in Figueira da Foz has been operating on a backup basis since 2021, since the installation of the new Biomass Boiler. In Setúbal, the start-up of the new recovery boiler in May 2025 enabled the complex to optimise generation of renewable steam, making it possible to scale back the activity of the natural gas co-generation plant, which now operates with only one of its two generator sets.
In addition to generating power we provide system services, in particular Frequency Restoration Reserve Band with manual activation, contributing to the security of the National Power System. [ESRS 2.42]

Customers are a strategic Stakeholder for our success, and we therefore invest in building a close commercial relationship and meeting their needs. Our main client categories include paper and cardboard manufacturers (in the case of pulp), wholesalers and retailers or printing and writing paper, retail chains and HORECA operators which market private brand and mill brand tissue products, as well as companies in the fashion, food retail, e-commerce, manufacturing and farming sectors which use gKraft™ packaging solutions. We serve a broad client basis, with a strong presence in Europe and in markets such as the United States,

Latin America, Turkey and Northern Africa, adjusting our offering to the specific needs of each segment and geographical region. [ESRS 2.42]

Management of suppliers relations is a fundamental strategic area for Navigator, in view of the significant impact of its purchasing policies on the creation and distribution of value and the dependency relationship that it has with those suppliers (chap. 5.4.1.2.2.). Its operations involves securing supplies of wood, biomass, chemicals and other products essential for the industrial process, as well as purchasing the power needed for production and consumption. The dispatch of products to a large number of countries and delivery points requires complex logistical management, using maritime, rail and road transport, with a commitment at all times to minimise the environmental footprint and to optimise the efficiency of the supply chain. We have developed partnerships with suppliers of wood, biomass, forestry services, logistics and equipment, and adopted initiatives for industrial symbiosis with companies in other sectors, making it possible to reuse by-products (such as fly-ash, sand and carbonate sludges) as secondary raw materials in applications in the construction materials industry, reducing the consumption of virgin resources and promoting circularity [ESRS 2.42]

Navigator contributes to the rural economy, through development of the regions where we operate and improving the woodlands it manages, with an impact on local Communities. In particular, we add value to the entire forestry value chain, highlighting the potential of Portuguese forests for producing a diversified range of products. By means of programmes to support Forestry Producers, environmental and forestry literacy initiatives, investment in local job creation and biodiversity conservation projects, we have stepped up our contribution to creating economic, social and environmental value in the communities where we operate. [ESRS 2.42]

Information related to sustainability

Navigator's **2030 Responsible Management Agenda** (Chap. 3.4.2) embodies the Company’s strategy for responsible management, giving it practical form and direction. Based on the principle of “**Creating Value Responsibly**” this agenda was developed to boost the company’s positive impact in the long term, contributing to sustainable growth, aligned with the demands of a constantly changing world [ESRS 2.40g]

Its management is anchored in the principles of Ethics, Responsibility and Transparency. Faithful to the **Company’s Purpose** (Chap. 2.1) - centred on people, their quality of life and the future of the planet - it accepts our responsibility for developing forest-based products that promote sustainable development and the well-being of society, in alignment with the United Nations 2030 Agenda. [ESRS 2.40g]

Navigator has preferred to focus on creating long-term value, achieving operational excellence and business diversification, thereby boosting the company’s performance, business resilience and reputation. Sustainability is seen as a strategic competitive advantage (Chap. 2.3). In this context, the 2030 Agenda is structured around to strategic action areas (for Climate and Nature, and for Society), each of which with its specific orientation and aligned with the two dimensions of its purpose, People and the Planet (Chap. 3.4.2): [ESRS 2.40g]

- **For Climate and Nature – Act:** preserve and add value to natural capital, thereby generating economic, environmental and social value by minimising the ecological footprint and optimising efficient use of resources; contribute to a circular and low-carbon economy based on innovation, technology and R&D.

- **For Society – Grow:** Apply ethical principles, demonstrate integrity and transparency in its actions, manage risk, promote respect for human rights and accept commitments to its Stakeholders; develop its people, engage with communities and share value with society in a fair and inclusive way.

The 2030 Roadmap (Chap. 3.4.4) consists of a raft of commitments aligned with the SDGs, defined through collaboration with the different sustainability key users in the Company's different business areas. The commitments are linked to a number of goals and targets, many of which are presented in each of thematic standards. [ESRS 2.40g]

Revenues

In 2025, Navigator generated total revenues of 1 970 million euros. The revenues from the different sectors in which Navigator operates are detailed in 2.1 of the Notes to the Financial Statements, in relation to the business segments.

As regards activities with a major climate impact, Navigator has two Combined Cycle Natural Gas Power Stations which are currently operating for in-house consumption, with the sale of any power surpluses to the national grid. These assets fall within activity 4.30 (High-efficiency co-generation of heat/cool and power from fossil gaseous fuels) of European Regulation 2020/852 on the European Taxonomy. In 2025, earnings from this activity totalled 4.3 million euros – see Chap. 5.2.1. ESRS 2.40d-i]

The Company is not active in producing chemicals [ESRS 2.40d-ii] and does not generate revenues associated with coal and oil activities [ESRS 2.40d-i], controversial weapons [ESRS 2.40d-iii] or the cultivation and production of tobacco. [ESRS 2.40d-iv]

5.1.3.2. Interests and views of Stakeholders (SBM-2)

The following information is incorporated by reference to other parts of the management report:

- The company's engagement with Stakeholders (ESRS 2.45a/b): Chap. 3.4.5 Stakeholder Engagement.

Navigator's **own workforce** has a central role in our business, and is one of our priorities (Chap. 5.3.1). Our concern with their fundamental rights is expressed in our Human Rights Policy, which is reflected in our actions. We seek to be an exemplary employer and to maintain open and transparent dialogue with the workforce. The initiatives we pursue in order to listen to/engage with our Employees include the Industrial Relations Forum, regular meetings with Workers' Representative Organisations, the GROWING project, Employee consultation and organisational climate surveys (Chap. 5.3.1), which enable us to make continuous improvements to our strategic approach and to respond to Employees' expectations and needs.

Navigator includes **Value chain workers** in its overall approach to sustainability, ensuring responsible practices that apply simultaneously to direct employees and other Partners (Chap. 5.3.2). Their contributions are sought through the annual consultation process on health and safety at work and through their participation in training sessions (on-the-job and classroom training). [S2.9]

Navigator's most significant impact on **Affected communities** results from its contribution to territorial cohesion and retaining the population, especially in inland regions, through generation of decent employment, improved infrastructure, investment in social welfare and ensuring respect for the cultural and environmental rights of Communities. These factors promote better living standards and balanced development in the regions where we operate. [S3.7]

In order to build up this relationship, the Company has ongoing arrangements for dialogue and engagement, such as the Community Monitoring Committees (in Portugal) and the Community Liaison Officers (in Mozambique), enabling it to understand concerns, align expectations and respond to local needs, strengthening its social license to operate (Chap. 5.3.3). [S3.7]

In addition, Navigator explored business opportunities which promote multiple use of the forest, such as promotion of non-wood products or the allocation of areas to specific activities, such as combined farming and pasturage, or bee-keeping, considering at all times the local, regional or national economy and listening to representatives of the Communities involved when relevant.

We should stress that our governance model (Chap. 3.2) – which involves the participation of internal and external Stakeholders - enables engagement with various structures across Navigator on sustainability issues, to incorporate an external perspective from significant Stakeholders into efforts to honour our commitment to create value sustainably and to actively encourage all our Partners and Stakeholders to join us in pursuing these goals. We believe that only with strong governance will we be able to address the main environmental, social and economic risks and opportunities which have an impact on The Navigator Company,

and the impacts we generate for our various Stakeholders. In this way, all relevant contributions from our different Stakeholders are shared with the Executive Committee. [ESRS 2.45d]

No changes occurred in the reporting period to the Company's strategy or business model as a result of Stakeholder interactions. Stakeholder views are aligned with the Company's current strategy, and are often complementary. [ESRS 2.45c c1 c2]

5.1.3.3. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Impacts, risks and opportunities

The following information is incorporated by reference to other parts of the Non-Financial Statement, more specifically to the chapters on thematic standards, for detailed information on:

- Description of material impacts resulting from materiality assessment (ESRS 2.48a)
- Description of material risks and opportunities resulting from materiality assessment (ESRS 2.48a)
- Description of time horizons (ESRS 2.48c-iii)

The Company's negative or positive material impacts on people or the environment are identified at the start of each thematic standard [ESRS 2.48c-i]. In addition, the chapters on thematic standards detail the source of these impacts and their relationship with the Company's strategy and business model; most material impacts result from its activities or its commercial dealings, such as purchases of wood, its main raw material [ESRS 2.48c-ii] [ESRS 2.48c-iv]. It should be noted that the impacts, risks and opportunities identified are covered by the ESRS disclosure requirements, to which the topic "Sustainable Forestry Management" is added as an entity-specific disclosure, in view of the sector in which the Company operates. [ESRS 2.48h]

The current and anticipated effects of its material impacts, risks and opportunities on its business model, value chain, strategy and decision-making are addressed in theme SBM-3 of the thematic ESRS. [ESRS 2.48b]

Financial effects

In the next few years, Navigator plans to conduct a quantitative analysis of sustainability-related risks and assessment of the financial position of our assets and liabilities. [ESRS 2.48d| ESRS 2.48e]

In accordance with the derogation granted by Delegated Regulation (EU) 2025/1416 of the Commission, of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings, Navigator has opted not to report information on the anticipated financial effects of the impacts, risks and opportunities. [ESRS 2.48e]

Resilience of strategy and business model

At Navigator we believe it is essential to have a long-term plan of action that points us towards honouring the commitments set out in our 2030 Agenda. This is supported by the 2030 Roadmap, a tool based on an ESG framework, enabling the Company to achieve its ambitions, guiding and tracking its progress over time. At present, the commitments and goals in the 2030 Agenda and Roadmap relate mostly to the Group's activities in Portugal, but they are planned to evolve so as to include the other geographical regions in the next few years.

We have accordingly mapped out a position that seeks to boost value creation - maximising our performance, contributing to the resilience of our business and our corporate reputation and image, and paving the way for sustainability to feature as a strategic competitive advantage. [ESRS 2.48f]

The following information is incorporated by reference to other parts of the Non-Financial Statement, for detailed information on:

- Creating sustainable value - Chap. 2.3
- Business strategy - Chap. 3.1
- 2030 Agenda and Roadmap - Chap. 3.4
- Analysis of climate resilience (ESRS 2.48f) – Chap. 5.2.2.1.1

Changes in material IROs in relation to previous reporting period

Following on from the Double Materiality Assessment conducted in accordance with the CRSD and presented in last year's report, we reviewed the analysis in the course of the year, resulting in the inclusion of new material IROs relating to water discharge and consumption, which have been incorporated into this report. [ESRS 2.48g]

5.1.4. Management of impacts, risks and opportunities

5.1.4.1. Processes to identify and assess material impacts, risks and opportunities (IRO-1)

The following information is incorporated by reference to other parts of the Corporate Governance Report:

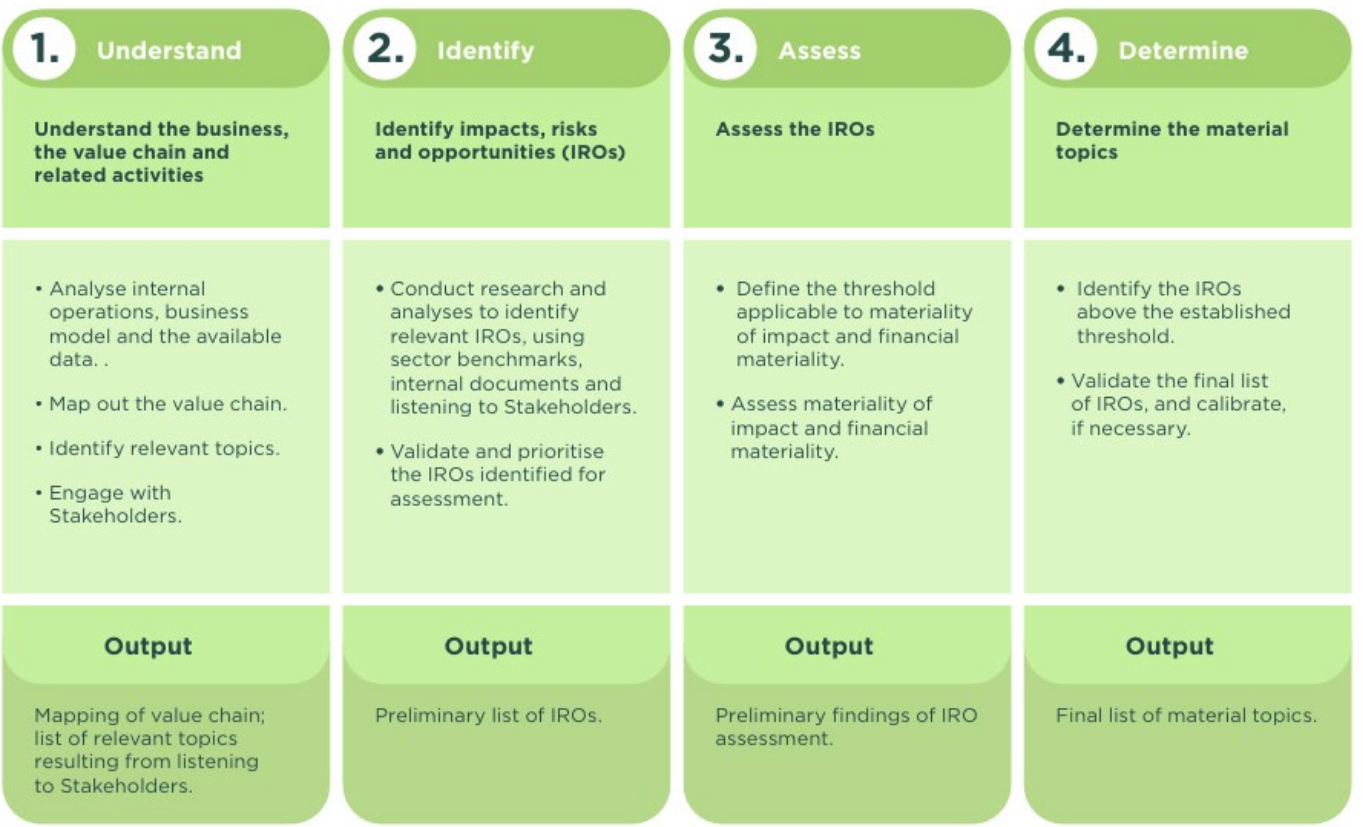
- Corporate Governance Report Part I - Information on Shareholder Structure, Organisation and Corporate Governance | C. Internal Organisation |III. Internal control and risk management.

The publication in the Official Journal of the European Union of the Corporate Sustainability Reporting Directive (CSRD) - Directive (EU) 2022/2464 established the requirements for reporting sustainability information for a broader group of companies, through application of the European Sustainability Reporting Standards (ESRS). As the new Directive has not yet entered into force in Portugal, Navigator has reported non-financial information relating to the FY24, to be published in 2025, and is voluntarily disclosing the information relating to the FY25 once again. This requirement presents the various stages of implementation of the double materiality process, as well as the methodologies used and the findings obtained. This analysis was reviewed in 2025 and this exercise resulting in the inclusion of new IROs relating to water discharge and consumption.

The double materiality assessment was conducted in 2024 on the basis of a wide-ranging process - carried out in conjunction with the Semapa Group - which set out to identify, assess, prioritise and monitor the potential and real impacts, positive and negative, on people and the environment, in the short, medium and long term (**materiality impact, inside-out perspective**), as well as the risks and opportunities that might in turn have a financial effect on the Company (**materiality impact, outside-in perspective**). The assessment made from these two perspectives, referred to below as "**double materiality**", was carried out in the context of each of the ESRS, dealing with environmental, social and governance issues. [ESRS2.53a]

The double materiality reassessment followed a **four-stage methodological approach**. This design of the process will be reviewed at least annually (or as necessary), in order to ensure alignment with the most recent practices. [ESRS2.53a]

Methodological approach for reassessing double materiality



The initial stage took into consideration the organisation's business and operating processes, including the geographical regions where the Group operates, and commercial relations upstream and downstream (mapping of value chain).

Past experience was taken into account, in view of the **history of significant interaction** with external experts and Stakeholders. An external listening exercise was not conducted, as it is **not required** by the CSRD. Even so, the findings obtained in this materiality review turned out to be largely aligned with previous periods.

Contextual information and identification of IROs

The identification stage for the preliminary list of IROs involved 15 information sources, ranging from general resources, sustainability reports and the internal resources of the Navigator and Semapa Groups, as well as external resources. On the basis of the research, a list was drawn up with a total of 322 IROs, at the ESRS sub-sub-topic level and considering in the mapping the business models across the various subsidiaries of the Semapa Group (which includes The Navigator Company), the geographical regions where they operate and their location along the value chain. [ESRS2.53a | ESRS2.53bi/ii/iii]

In addition to the resources listed above, the four stages of the double materiality analysis also involved considering the inputs from a number of internal specialists who took part in the various working sessions to validate and assess the list. [ESRS2.53a | ESRS2.53biii | ESRS2.53g]

[5] Navigator Group's first double materiality exercise

Description of the processes for identifying and assessing the IROs

As stated, the Double Materiality Analysis considered all the ESRS Standards, applying a consistent methodology and criteria for identifying, assessing and prioritising Impacts, Risks and Opportunities (IROs). This process was conducted on an integrated basis, ensuring coherence between topics and reflecting critical dependencies, impacts and the Group's operational context. No materially relevant IROs were identified in respect of thematic standards E2 and S4. [E1.20a | E1.20b | E1.20c | E2.11 | E3.8a | E4.17a | E5.11 | G1.6]

In addition, specific aspects were considered in the context of some of the thematic standards, as presented below.

In the case of **Climate change**, as recommended by the TCFD, in 2002 we identified and assessed the main physical risks, acute or chronic, and the transition risks, which consist of regulatory, technological, market and reputational risks. In the course of this, and in keeping with the good practices in the TCFD Guidance on Scenario Analysis, we used exploratory scenarios that describe a diverse range of plausible future states, which are used to assess potential climate-related risks and uncertainties, and also to test the resilience of Navigator's strategy for the different future conditions adjacent to these same scenarios (Chap. 5.2.2). We also identified climate-related opportunities, with potential positive impacts for business: As a member of the "Climate and Energy" and "Sustainable Reporting and Finance" working parties of BCSD Portugal, we took part in a task-force (TF) on the subject to climate risks and opportunities, resulting in a new "Business guide to climate risks and opportunities". The expertise acquired in this process and from the WBCSD's "Climate-related Financial Impact Guide" has been applied in the "impact pathways" approach. This is a way of calculating the financial impact of the risks and opportunities identified, on the basis of different risk implications or opportunities for the Group. In our assessment of transition risks and opportunities, we identified short, medium and long term events and analysed the exposure of our assets and business activities to these, by assessing the variation in CO_2 prices in the short, medium and long term. The information resulting from these processes contributed to identifying the IROs within the scope of the respective analysis. [E1.20a | AR9 | AR12a].

Pollution is a significant topic in Navigator's activities, and the Company ensures that it complies in full with the applicable legal requirements, as well as the upper limits for emissions set in the respective environmental licenses. In the analysis of impacts, risks and opportunities conducted in the double materiality assessment, the topic of pollution was not classified as material in the light of the ESRS standards. Even so, it is regarded as relevant to management of the organisation, which each year implements measures to mitigate the potential risks identified. In view of the business model, the location and nature of the Group's activities, no relevant risks or opportunities have been identified which warrant classification as a material topic. [E2.11| E2.11a| E2.11b]

In the case of **water resources**, it is stressed that the IROs identified were screened using several tools and criteria, including the WRI Aqueduct Water Risk Atlas, which makes it possible to map areas of water stress, Hydrographic Region Management Plans (HRMPs), Cycle 3, the Water Footprint Indicators, which measure the water impact of products, and the Certification under ISO 14001, which guarantees sustainable practices in water management. This analysis also considered the location of own operations and assets in areas with a high water risks, assessing critical dependencies and potential impacts on the availability of water. [E3.8a]

With regard to **biodiversity and ecosystems**, identification and assessment of IROs was informed by Navigator's prior knowledge of its impacts on biodiversity, on the basis of its practices for assessing impacts from the Group's forestry activities and its participation in a pilot project, under the Natural Capital Protocol, undertaken in 2018. In connection with this, it is important to stress that biodiversity conservation is built into our forest management model, applying a hierarchy of impact mitigation and assessment of the wildlife both in the areas under management and the surrounding areas. Starting with this underlying body of information, the compilation of additional information and the mapping of conservation interest zones contribute to an overall assessment of the risks and opportunities and design of appropriate conservation measures. Consideration was also given to sensitive areas for biodiversity and the location of threatened species, as well as dependencies and impacts associated with own operations and the value chain. For all activities with potential impact, pre-operational assessments are carried out in order to plan the execution of operations at a local scale, considering the wildlife, cultural heritage and social factors and consulting Stakeholders. [E4.17a].

The pilot project mentions were designed to align Navigator's existing procedures with a internationally agreed standardised structure, published in the "Forest Products Sector Guide to the Natural Capital Protocol". This exercise was carried out on the basis of data gathered over the preceding ten years and involved identifying dependencies on the basis of the ESR (Ecosystem Services Review). [E4.17b].

Lastly, through participation in the WBCSD Forest Solutions Group, Navigator has collaborated in drawing up guidelines on **sustainable forest management** developed and disseminated in the document entitled "Forest Sector Nature-Positive Roadmap", which has served as an additional benchmark for identifying IROs related to Sustainable Forestry Management. In addition, this document has served as an important starting point for defining other environmental IROs related to the forest, in relation to other topics in the standards, strengthening Navigator's integrated approach to IROs and to its value chain. [E4.17a]

The identification and assessment of the IROs associated with sustainable forestry management reflect the centrality of the forest in Navigator's business model and its intrinsic connection to other material topics. The Company applied recognised responsible management practices, based on planning, pre-operational planning and internationally accepted certifications, ensuring that the areas under management (both owned and rented) are operated in an environmentally and socially balanced way. This approach enables Navigator to significantly reduce risks such as forest fires through structure programmes of prevention, fuel management and planning based on risk, boosting climate resilience, reducing potential losses and strengthening the social license to operate. At the same time, it works to protect the natural, cultural and social heritage in its territory, supported by specialist cartography and application of the mitigation hierarchy, directly contributing to biodiversity conservation (E4) and to the ecological integrity of the forest areas.

Navigator also ensures that the wood it purchases is obtained exclusively from credible and certified sources, preventing deforestation, conversion of natural ecosystems and other connected negative impacts, thereby reducing legal, reputational and operating risks. In coordination with topics E5, S2 and S3, the Company promoted certification and training of land owners, service providers and partners in the value chain, disseminating good practices in forestry management and integrating

conservation considerations and socio-cultural values in its operations. At the same time, it invests in research, innovation and knowledge sharing in areas such as climate adaptation, ecological restoration and improvement of ecosystem services, creating opportunities which boost the resilience of forests and the sector, and also contributing to an integrated approach to identifying and managing its IROs.

The **circular economy and use of resources** are important pillars of Navigator's operations, reflecting in the way in which the Group manages its operations throughout the value chain. In connection with its analysis of impacts, risks and opportunities under ESRS E5, Navigator has systematically assessed the critical dependencies linked to this topic, as most particularly for wood as a raw material essential for its business model. Navigator's business model incorporates consolidated circular economy practices and responsible management of resources, from sourcing in the forest through to industrial processes, ensuring production is aligned with sustainability principles and mitigating the risks linked to dependency on raw materials. These practices contribute to efficiency in the use of raw materials, waste reduction and the reuse of secondary flows. [E5.11]

In addition, Navigator is working on initiatives to develop industrial symbiosis with companies in other sectors, some of them with a long history, promoting efficient use of resources and the reclamation of waste and by-products. The company continuously assessed solutions for these flows, attaching priority to reincorporation in its own operations or reuse through partnerships for industrial symbiosis projects. [E5.11]

With regard to IROs relating to **People** (S1, S2 and S3) and **Governance** (G1), the analysis takes consideration of internationally recognised principles, such as the ILO Conventions and the Universal Declaration of Human Rights. The assessment has incorporated internal data, historical indicators, such as occupational health and safety (OHS) data and the experience of our specialists, complemented by external reference materials, such as benchmarking with other companies in the sector and international studies. For business conduct topics (G1), all the material IROs are incorporated in the macro risks in our Enterprise Risk Management (ERM) system, ensuring a systematic approach top management of ethics and compliance risks. The experience acquired through participation in global initiatives, such as the UN Global Compact, and involvement in industry groups have helped Navigator to identify IROs and adopt the good practices already implemented, ensuring that risks and opportunities are addressed consistently throughout the value chain. [G1.6]

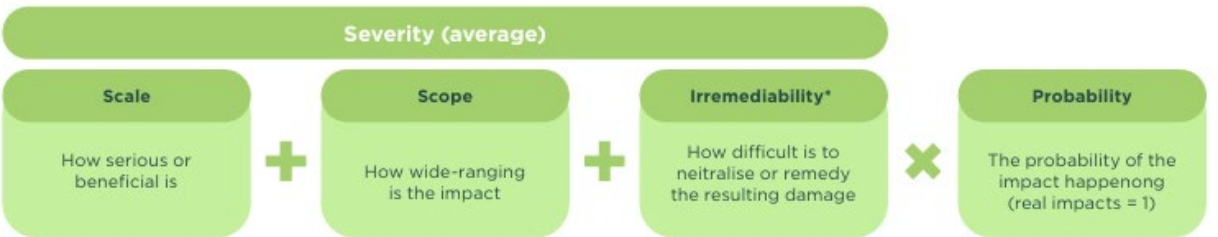
Material IRO assessment process

The process of assessing IROs was carried out through a total of **25 meetings**, involving the participation of **73 internal experts**, representing 25 sectors in 20 Departments. During the sessions for each ESRS standard, each expert gave their opinion on each of the IROs, and the final assessment was the result of a consensus between the various participants involved. [ESRS2.53a | ESRS2.53biii]

Materiality of impact

In assessing the **materiality of impact**, we addressed the negative and positive impacts, actual and potential, on the basis of their **severity** (a combination of scale, scope, and irremediable character, in the case of negative impacts only) and **probability** (not considered for the purposes of calculating the materiality of negative impacts on human rights, in which case severity was scored in the light of the respective probability). Using quantitative limits for each parameter, the material impacts were identified. [ESRS2.53a | ESRS2.53biv]

Factors for assessing the materiality of impact



Assessment methodology applied

Scale	Scope	Irremediable character	Probability
5= Very great damage or benefits for people or the environment	**5=** National or international impact and/or impact on a large number of people	**5=** Difficult to remediate or irremediable/irreversible	**1=** Certain (<6 months| Happening)
4= Great damage or benefits for people or the environment	**3=** Regional impact and/ or impact on a moderate number of people	**3=** Temporary or easily remediable in the medium term	**0.80=** Very probable (6 months to 1 year)
3= Moderate damage or benefits for people or the environment	**1=** Local impact and/or impact on a small number of people	**1=** Temporary or easily remediable in the short term	**0.60=** Probable (1 to 2 years)
2= Minor damage or benefits for people or the environment	**0=** Not applicable	**0=** Not applicable	**0.40=** Unlikely (2 to 5 years)
1= Very minor damage or benefits for people or the environment			**0.20=** Rare (> 5 years)
0= Not applicable			

Time Horizon	**Short term:** Reporting year | **Medium term:** From reporting year and up to 5 years | **Long term:** More than 5 years

*aplicabble to negative impacts

Financial materiality

In assessing **financial materiality**, using quantitative limits, we assessed the probability and magnitude of the financial effects of the risks and opportunities and consequently identified the material risks and opportunities for Navigator. It should be noted that, with regard to the magnitude criterion, the scoring scales established were based on intervals corresponding to the percentage of EBITDA, each of the subsidiaries having their respective benchmark values. [ESRS2.53c]

Factors for assessing financial materiality

Magnitude		Probability
Magnitude of the potential financial effect	✖	The likelihood of the risk/ opportunity happening

Assessment methodology applied

Magnitude	Probability
5= Critical - Over 20% of EBITDA	**1=** Certain (<6 months| Happening)
5= High - Between 10% and 20% of EBITDA	**0.80=** Very probable (6 months to 1 year)
4= Medium - Between 5% and 10% of EBITDA	**0.60=** Probable (1 to 2 years)
3= Low - Between 1% and 5% of EBITDA	**0.40=** Unlikely (2 to 5 years)
1= Very low - Up to 1% of EBITDA	**0.20=** Rare (> 5 years)
0 = Not applicable	

Time Horizon

Short term: Reporting year
Medium term: From reporting year and up to 5 years
Long term: More than 5 years

Conclusion of double materiality process

When the assessment sessions were concluded, a **limit of 3** was set, applied to the materiality of impact and financial materiality. This limit was selected so as to use the same materiality threshold as established in internal risk analyses. Once the limit was established, a **calibration exercise** was carried out. After this review, the **final list of material IROs** for Navigator presents **62 impacts** (40 positive and 22 negative), **26 risks and opportunities** (16 risks and 10 opportunities), making a total of **88 material IROs**, breaking down as follows [ESRS2.53d]:

- 5 environmental topics, four corresponding to ESRS E1, E3, E4 and E5 and one for entity-specific disclosure;
- 3 social topics, corresponding to ESRS S1, S2 and S3;
- 1 governance topic, corresponding to ESRS G1.

These findings were subsequently validated by the Executive Committee. [ESRS2.53d]

Sustainability topic		Value Chain	IRO
Topic	**Sub-topic**	**Location**	**Typology**
ESG Dimension: Environment			
E1 Climate change	Climate change adaptation	Upstream, Own operations and Downstream	Positive Impact, Risk and Opportunity
	Mitigation of climate change	Upstream and Own operations	Positive impact, negative impact, Risk and Opportunity
	Energy	Upstream and Own operations	Positive Impact, Negative Impact, Risk and Opportunity
E3 Water and marine resources	Water - Water withdrawal	Own operations	Negative Impact and Risk
	Water - Water discharges	Own operations	Negative Impact
	Water - Water consumption	Own operations	Negative Impact
E4 Biodiversity and ecosystems	Impacts on status of species	Upstream and Own operations	Positive impact and negative impact
	Impacts and dependencies on ecosystem services	Upstream and Own operations	Positive impact and negative impact
	Factors with direct impact on biodiversity loss	Upstream and Own operations	Positive impact, Risk and Opportunity
E5 Resource use and circular economy	Inflow of resources, including use of resources	Upstream and Own operations	Positive impact and Risk
	Waste	Own operations and Downstream	Positive impact and Opportunity
	Outflows of resources related to products and services	Downstream	Positive impact and Opportunity
Sustainable Forest Management (Entity- Specific)		Upstream and Own operations	Positive impact
ESG dimension: Social			
S1 Own Workforce	Working conditions	Own operations	Positive impact, Impact negative and Opportunity
	Equal treatment and opportunities for all	Own operations	Positive impact, Impact negative and Opportunity
S2 – Workers in the value chain	Working conditions	Upstream and Own operations	Negative impact
	Equal treatment and opportunities for all	Upstream, Own operations and Downstream	Positive impact
	Other work-related rights	Own operations	Positive impact
S3 Affected communities	Economic, social and cultural rights of communities	Own operations	Positive impact
ESG dimension: Governance			
G1 - Business conduct	Corporate culture	Own operations	Positive impact and Risk
	Management of supplier relations, including payment practices	Own operations	Positive impact
	Corruption and bribery	Own operations	Positive impact

5.1.4.2. Disclosure requirements in ESRS covered by the Non-Financial Statement (IRO-2)

The materiality of information was determined on the basis of the material IROs resulting from Navigator's double materiality assessment. After identifying the material thematic standards, materiality was assessed with regard to disclosure requirements and datapoints. The materiality assessment process and the use of thresholds are described in the preceding section (IRO-1). [ESRS2.59]

The disclosure requirements to which Navigator responds, by means of this Non-Financial Statement, together with the list of datapoints resulting from other EU legislation, are identified in Chap. 9.1.1 ESRS Correspondence Tables. [ESRS2.56]

5.2. Environmental information

5.2.1. European Taxonomy

5.2.1.1. Background to the European Environmental Taxonomy

In 2019, the European Commission announced the European Green Deal, a new strategy for development with the aim of achieving climate neutrality by 2050 and to support economic growth through more efficient means and sustainable use of natural resources. To facilitate this, a practical framework for sustainable investment has been provided by Regulation (EU) 2020/852 of the European Parliament and the Council of 18 June 2020, on the taxonomy. The Taxonomy functions as a standardised and mandatory classification system, i.e. a common language, to be used to determine which economic activities are considered "environmentally sustainable" in the European Union. The idea is for companies to direct their investment flow to activities regarded as sustainable, whilst at the same time maintaining transparency in reporting and reducing the possibility of greenwashing.

According to the Taxonomy Regulation, in order for an economic activity to be environmentally sustainable it must:

1. Contribute to at least one of the six environmental objectives identified in the Regulation /climate change mitigation; climate change adaptation; sustainable use and protection of water and marine resources; transition to a circular economy; pollution prevention and control; protection and restoration of biodiversity and ecosystems);
2. Not significantly harm any of the other five objectives; and
3. Comply with the minimum social safeguards relating to Human Rights, Corruption, Taxation and Fair Competition.

In view of the European Taxonomy and the publication by the European Commission of the Climate, Environmental and Complementary Delegated Acts, the Navigator Group discloses in its 2025 reporting the results of the eligibility analysis and alignment of its economic activities. In 2025, Delegated Regulation (EU) 2026/73 of 4 July 2025 was published, following the amendments introduced by the Omnibus Package to the EU Taxonomy. In accordance with Article 4 of this Regulation, the Navigator Group has chosen not to apply the amendments introduced by this Regulation for the 2025 financial year.

5.2.1.2. Eligibility analysis

In 2025, the activities identified as eligible under the Climate Delegated Act, the Complementary Delegated Act and the Environmental Delegated Act are:

Activities	Code*
Forest Management	CCM 1.3
Electricity generation using solar photovoltaic technology	CCM 4.1
Electricity generation from bioenergy	CCM 4.8
Cogeneration of heat/cool and power from bioenergy	CCM 4.20
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1
Construction, extension and operation of waste water collection and treatment systems	CCM 5.3
Close to market research, development and innovation	CCA 9.2
Conservation, including restoration, of habitats, ecosystems and species	BIO 1.1

* CCM - Climate change mitigation; CCA – Climate change adaptation; BIO – Biodiversity and Ecosystem Restoration

Navigator's main economic activities, which are production of pulp and paper, continue not to be eligible under the European Taxonomy.

All the activities described above which are eligible for the climate change mitigation objective (CCM) are also eligible for the climate change adaptation objective (CCA). The Group considers that the climate change mitigation objective is the most relevant in these cases.

At present, the Taxonomy delegated acts lay greatest stress on industries that are more carbon intensive / green energy intensive. This means that the Group's main activities - pulp and paper production - are not contemplated, and cannot therefore be included in the Navigator Group's eligible activities.

5.2.1.3. Alignment analysis

The eligibility and alignment of activities with the technical criteria established in the taxonomy regulation are analysed annually by the Company. For each economic activity, the Group assessed the criteria of "Substantial contribution" (SC) and "Do no significant harm" (DNSH). The conclusions stated were based on the best knowledge existing at the date of analysis of these criteria.

1.3 - Forest Management	Navigator manages approximately 139 thousand hectares of woodlands, including production and conservation forests. In mainland Portugal, the entire area managed is certified under the FSC® and PEFC standards, and subject to audits by independent external entities. However, one of the criteria for alignment of this activity is the existence of a specific audit for verification of SC and DNSH criteria. In order to respond to this criterion, Navigator is actively seeking a partner able to conduct an audit that responds to the requirements of the European Taxonomy, and until then the activity is considered as unaligned. In connection with this activity, the Group considered in its CapEx KPI the acquisition of forest land, as well as other investment supporting forest management.
4.1 - Electricity generation using solar photovoltaic technology	Navigator has eight Solar Power Facilities for in-house consumption, which contribute to reducing scope 2 greenhouse gas emissions and also its dependence on the electricity market. Navigator considers that this activity is carried on in alignment with the criteria for CS and DNSF.
4.8 – Electricity generation from bioenergy	Navigator has two Biomass Power Plants, which used waste forestry biomass certified under the SBP standard for power generation. The Group considers that the forestry biomass used meets the criteria established in Article 29, paras. 6 and 7, of EU Directive 2018/2001. All the waste forestry biomass used is acquired on the domestic market, in compliance with Portuguese legislation, thereby complying with the sustainability criteria and in alignment with the Taxonomy.
4.20 Cogeneration of heat/cool and power from bioenergy	Navigator has six High Efficiency Renewable Cogeneration Plants, which use biomass by-products resulting from pulp production, in particular black liquor and eucalyptus bark. An important development in 2025 was the incorporation of a new Recovery Boiler in the Renewable Cogeneration Plant in Setúbal, and of a new Renewable Cogeneration Plant in Figueira da Foz, supporting paper production. In addition, waste forestry biomass is acquired, which is certified under the SBP standard The Group considers that the criteria established in Article 29, paras. 6 and 7, of Directive EU 2018/2001 are met. All the waste forestry biomass is purchased on the Portuguese market and in accordance with Portuguese legislation, thereby complying with the sustainability criteria. This activity is taxonomy-aligned.
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	The Group operates two combined-cycle natural gas cogeneration plants. Although Navigator considers that most of the technical requirements for alignment are met, it has not yet been possible to identify and external verifier to assess the activity under the Taxonomy Regulation, and report its findings to the European Commission. The activity was accordingly considered non-aligned.
5.1 Construction, extension and	The water used in production processes is withdrawn and treated by Navigator's own systems at the industrial complexes in Aveiro, Figueira da Foz and Setúbal. Power consumption by withdrawal and

operation of water collection, treatment and supply systems	treatment systems is less than 0.5kWh per m^3 of water supplied at the industrial complexes in Aveiro and Figueira da Foz, but higher in Setúbal. For that reason, this activity is considered taxonomy-aligned in Aveiro and Figueira da Foz and non-aligned at the Setúbal industrial complex.
5.3 Construction, extension and operation of waste water collection and treatment systems	The Group has waste water collection and treatment systems (WWTP) at all its production units in Portugal. Power consumption by this facilities is below the level set in the criterion for CS for this activity. As a result of the technical assessment of the criteria for SC and DNSH set in the Delegated Act, this activity is considered to be taxonomy-aligned.
9.2 Close to market research, development and innovation	Through Instituto Raiz, the Group carries on research activities, including applied research, and experimental development of solutions, processes, technologies and other products geared to climate change adaptation. Attention is here drawn to the programme for genetic improvement of eucalyptus, with a significant contribution to climate change adaptation. The Group considers the criteria for SC and DNSH to be met, and so the activity is considered to be taxonomy-aligned.
1.1 Conservation, including restoration, of habitats, ecosystems and species	This activity contributes to re-establishing or restoring ecosystems, habitats or species habitats in good conditions. The activity meets the criteria for SC and DNSH, and so is considered to be taxonomy-aligned. The eligibility and alignment analysis took into account CapEx and OpEx relating to the Zambujo reCover Project.

Additional detail on application of criteria relating to the Appendices of the Climate Delegated Act

Application of the criteria relating to Appendix A of the Climate Delegated Act	Navigator has implemented an enterprise risk management system (ERM) which enables it to identify, assess, monitor and mitigate risks which may impact its operations, reputation and regulatory compliance (Chap. 3.3). In order to assess climate, physical and transition risks, Navigator follows the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Assessment of the financial impact resulting from the risks identified considers two time horizons (2035 and 2050) and three climate scenarios aligned with rising levels of temperature increase as established by the IPCC – RCP 2.6, RCP 4.5 and RCP 8.5 (Chap. 5.2.2.2.1). Navigator establishes information on the level of exposure of its assets to the physical risks of drought, heat waves, cold, fires and pests, for each region of the country. The findings of the analysis make it possible to classify production areas in accordance with their level of climate vulnerability to the risks identified, considering the respective factors of exposure, sensitivity and ability to adapt. In reforestation and biodiversity conservation practices, the findings of the analysis described are taken into account. Navigator plans to go further in assessing its physical risks, by broadening this study to include more climate risks and scenarios and a more robust analysis of the potential impact on its activities, resulting from both its own operations and from its value chain.
Application of Appendix B criteria (Sustainable use and protection of water and marine resources)	Navigator carries on its activities in accordance with the Portuguese legislation in force, in particular Law 58/2005 which transposed Directive 2000/60/EC, and with management plan for use and protection of water resources. The Environment Impact Studies to which its facilities are subject are carried out under Directive 2014/52/UE (updating Directive 2011/92/UE) and involve an assessment of impact on water resources.
Application of Appendix D criteria (Protection and restoration of biodiversity and ecosystems)	Biodiversity conservation is built into Navigator's forestry management model, with action to protect and restore biodiversity and ecosystems. The Navigator Group has annual plans for monitoring biodiversity in its forestry holdings. Around 12% of its woodland holdings comprise areas of conservation interest, and 4 647 hectares are classified by Rede Natura 2000 as protected habitats. Navigator sets out to protect biodiversity, creating a positive impact by taking action in keeping with its commitments in connection with the act4nature Portugal initiative.

Application of criteria for DNSH for Pollution prevention and control	The Group's policy is to adopt the best available techniques (BATs) for the sector, in particular those that can mitigate the environmental impacts associated pollution from its production processes. Through its **Management Systems Policy** and **Environmental Policy**, the Company has made commitments to ensuring compliance with the requirements applicable to its activities and products, and also to manage and mitigate environmental risks, in particular by controlling and preventing pollution and responding to potential environmental emergencies, safeguarding the precautionary principle.

Minimum safeguards

In order for eligible activities to be classified as aligned, it is essential that they comply with minimum social safeguards. The Taxonomy defines these safeguards as "alignment with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights". In order to help companies comply with these requirements, the European Commission's Platform on Sustainable Finance published, in 2022, the Final Report on Minimum Safeguards, where it identifies four essential areas that must be addressed to ensure conformity: Human Rights, Corruption, Tax and Fair Competition.

Human Rights

The Navigator Group recognises the fundamental importance of respect for Human Rights and for employment rights; this is built into its business activities. To this end, it has adopted and implemented a number of internal instruments, including the Human Rights Policy, the Code of Ethics and Good Conduct, the Equality Plan and the Code of Good Conduct for Preventing and Combating Workplace Harassment.

Mindful of the important role its suppliers play in advancing Human Rights, Navigator has implemented a Code of Conduct for Suppliers, which complements the Code of Ethics and Good Conduct and sets out to align its Partners' practices with the principles followed by the Group. Navigator has also implemented a Third Party Vetting System, based on due diligence procedures for identifying and mitigating risks related to corruption and related offences, money laundering, international sanctions and Human Rights violations.

In 2024, Navigator signed up to the UN Global Compact, took part in the Business & Human Rights Accelerator Program and conducted a first level assessment of the actual and potential impacts of its operations throughout the value chain, identifying priorities for action. The programme enabled it to develop internal skills, establishing a firm foundation for future analyses and mitigation and remediation strategies. And in 2025, the Company reviewed its double materiality analysis, resulting in identification of material impacts, risks and opportunities in its own operations and along the value chain. Navigator also has FSC and PEFC certification for forest management and the chain of custody, ensuring that environmental and human rights risks associated with the source of the wood it acquires are monitored.

Corruption, Fair Competition and Tax

In view of the international context in which it operates, the growing involvement of the private sector in combating corruption and related offences, and the legal obligations incumbent on it, Navigator has adopted a Policy for Prevention of Corruption and Related Offences Policy for Prevention of Corruption and Related Offences, through which it seeks to establish a series of professional values and standards of integrity which must be shared by all its Employees.

Complementing this, Navigator has implemented a Plan for Prevention of Corruption and Related Offences Risks (PPR), in which it identifies the risks of corruption and related offences to which it is exposed, establishes criteria for assessing these risks and lays down preventive and corrective measures designed to mitigate the likelihood of their materialising. Under the

PPR, Assessment Reports are drawn up, quantifying the degree of execution of the preventive and corrective measures defined, as well as the projection for full implementation.

With regard to competition, Navigator is committed to acting in compliance with competition law, to abiding by market rules and standards and to promoting fair competition. These commitments are reflected in internal documents, such as the Code of Ethics and Good Conduct and the Code of Conduct for Suppliers, which expressly lay down that Navigator's business, together with that of its Suppliers, must be conducted in accordance with the standards governing fair competition and all the relevant legislation.

In tax matters, the Company has implemented a Tax Policy, which is designed to ensure that the entities making up the Group comply with their tax obligations, in all the jurisdictions in which they do business, seeking to maintain full compliance with the legislation applicable. Aware of its role in Portugal's industrial and business fabric, and because of the vital importance of transparency in dealings with Stakeholders, Navigator has sought in recent years to calculate its tax footprint, so as to identify and disclose the volume of tax revenues obtained from its business operations and the taxes it collects and administers on behalf of the State and other parties.

The Group regularly provides training on Ethics and Integrity for all its Employees, designed to stress the importance of the rules established in the Code of Ethics and Good Conduct and other internal policies. Specific training was provided in 2025 on Personal Data Protection and Employment Law. Navigator also provides a Whistleblowing Channel, on its website, for reporting any irregularity detected by its Stakeholders, in connection with the topics addressed above. This channel is governed by the Whistleblowing Regulations which the Company has implemented.

In the course of its Taxonomy-eligible activities in 2025, the Navigator Group did not identify any relevant conviction on matters of Human Rights, Corruption, Tax or Fair Competition. Without prejudice to the above, attention is drawn to the anti-dumping proceedings brought by the Department of Commerce in the United States, in connection with investigation of alleged dumping practices in paper imports in several formats from five countries (Australia, Brazil, China, Indonesia and Portugal). As a result of these proceedings, anti-dumping duties are applied on Portugal's exports to the United States of certain types of paper marketed by Navigator. These exports are related to a taxonomy non-eligible activity.

5.2.1.4. Disclosure of KPIs

The Taxonomy Delegated Act (Article 8) establishes a number of key performance indicators (KPIs) associated with environmentally sustainable activities that non-financial undertakings must disclose: the proportion of their turnover (Turnover KPI), the proportion of their capital expenditure (CapEx KPI) and the proportion of their operating expenditure (OpEx KPI). Below we present the summary of findings:

KPI eligibility and alignment	Total (EUR)	Proportion eligible and aligned (%)	Proportion eligible and non-aligned (%)	Proportion non-eligible (%)
Turnover	1 969 765 842 €	4.8%	0.2%	95%
CapEx	247 528 901 €	29.6%	2.4%	67.9%
OpEx	83 682 914 €	16.4%	4.7%	78.9%

Accounting policies

As established in the Taxonomy, the figures reported were calculated in accordance with Navigator's Consolidated Financial Statements for the financial year ended 31 December 2025, which were prepared in conformity with the International Financial Reporting Standards (IFRS), in force at 1 January 2025 and as adopted by the European Union.

The European Taxonomy requires companies to disclose how they avoided duplication in considering economic activities eligible (numerator), in other words, in determining turnover, capital expenditure and operational expenditure. The Navigator Group determined eligible expenses on the basis of its financial and cost accounting and ensured that cost items were considered only once in calculating indicators.

Turnover

Turnover was determined on the basis of International Financial Reporting Standard IFRS 15, i.e. considering sales and services provided in the course of the Navigator Group's normal business. Total turnover (denominator in calculating the ratio eligible activities) therefore corresponds to the revenue reported in the Consolidated Financial Statements (2.1 of the Notes to the Financial Statements).

The turnover from eligible and aligned activities corresponds to the sale of electricity from renewable biomass cogeneration facilities and biomass power plants. The turnover from eligible and non-aligned activities corresponds to the sale of electricity from natural gas cogeneration facilities. The other eligible activities are used mostly in internal Group operations and, as such, are not considered for the purposes of this indicator.

CapEx

The figure stated as total CapEx in the denominator calculation of the eligible activities ratio corresponds to the sum of acquisitions in 2025 of tangible assets, intangible assets (excluding CO_2 licenses) and right-of-use assets, as disclosed in nos. 3.2, 3.3 and 3.6 of the Notes to the Navigator's Financial Statements.

For the purposes of determining this ratio, additions of intangible assets related to acquisitions of CO_2 licenses were excluded, insofar as these doe not correspond effectively to acquisition of licenses, but rather to licenses awarded to the Group, and their classification as intangible assets results from the accounting policy adopted by the Group. No additions were recorded in 2025 to the Group’s investment properties.

The CapEx values classified as eligible, including those considered both Taxonomy-aligned and Taxonomy non-aligned, correspond to investment in assets or processes associated with the Group’s activities, in particular:

- Investment to support forest management activities, in particular acquisition of forest land;
- Investment in biomass power plants;
- Investment in biomass cogeneration plants, which includes investment in new recovery boiler in Setúbal and the new steam turbines in Aveiro and Setúbal;
- Investment in effluent treatment at industrial complexes, which includes investment in WWTP 2 in Setúbal;
- Investment in Research & Development projects in connection with the genetic improvement programme; and
- Investment in conservation, including restoration, of habitats, ecosystems and species, in connection with Zambujo reCover Project.

OpEx

The total OpEx stated in the denominator for calculation of the eligible activities ratio corresponds to the following expenditure determined on the basis of the Consolidated Financial Statements at 31 December 2025:

- Uncapitalised research and development costs;
- Expense of industrial cleaning;
- Maintenance and repair expense included in no. 2.3 of the Notes to the Consolidated Financial Statements.
- Expense of specialist work directly related to maintenance and repair. These costs have been analysed item by item.
- Personnel expenditure in connection with maintenance and repair.
- Uncapitalised short term lease expense; and
- Other expense directly relating to maintenance of tangible fixed assets.

The OpEx values associated with the Group's eligible activities (Taxonomy-aligned or non-aligned) correspond essentially to expenditure on research and development relating to forestry, expenditure related to habitats and ecosystem conservation and restoration, uncapitalised expenditure needed to operate renewable biomass co-generation plants, biomass power plants, natural gas co-generation plants, withdrawal and treatment of water and collection and treatment of effluents.

5.2.1.4.1. Proportion of Turnover from products or services associated with Taxonomy-aligned economic activities

Financial year 2024	2025			Substantial contribution criteria						Criteria for DNSH ("do no significant harm") (h)									
Economic activities (1)	Code (a) (2)	Turnover (3)	Proportion of turnover, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover Taxonomy-aligned (A.1) or taxonomy-eligible (A.2), 2023 (18)	Category — enabling activity (19)	Category — transitional activity (20)
Text		*Euro*	*%*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*%*	*E*	*T*
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation from bioenergy	CCM 4.8	15 962 600 €	1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1%		
Cogeneration of heat and power from bioenergy	CCM 4.20	78 310 913 €	4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	4%		
Turnover from environmentally sustainable activities (Taxonomy-aligned) (A.1)		94 273 513 €	5%	5%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	6%		
Of which, enabling activities		0 €	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	E	
Of which, transitional activities		0 €	0%	0%						Y	Y	Y	Y	Y	Y	Y	0%		T

A.2. Taxonomy-eligible but environmentally unsustainable activities (Taxonomy non-aligned activities) (g)											
High-efficiency co-generation of heat and power from fossil gaseous fuels	CCM 4.30	4 272 801 €	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL		0%
Turnover from Taxonomy-eligible but environmentally unsustainable activities (Taxonomy non-aligned activities) (A.2)		4 272 801 €	0%	0%	0%	0%	0%	0%	0%		0%
A. Turnover from Taxonomy-eligible activities (A.1+A.2)		98 546 313 €	5%	5%	0%	0%	0%	0%	0%		6%
B. TAXONOMY NON-ELIGIBLE ACTIVITIES											
Turnover from Taxonomy non-eligible activities (B)		1 871 219 529 €	95%								
Total (A + B)		1 969 765 842 €	100%								

5.2.1.4.2. Proportion of CapEx on products or services associated with taxonomy-aligned economic activities

Financial year 2025	2025			Substantial contribution criteria						Criteria for DNSH ("do no significant harm") (h)									
Economic activities (1)	**Code (a) (2)**	**CapEx (3)**	**Proportion of CapEx, year N (4)**	**Climate change mitigation (5)**	**Climate change adaptation (6)**	**Water (7)**	**Pollution (8)**	**Circular economy (9)**	**Biodiversity (10)**	**Climate change mitigation (11)**	**Climate change adaptation (12)**	**Water (13)**	**Pollution (14)**	**Circular economy (15)**	**Biodiversity (16)**	**Minimum safeguards (17)**	**Proportion of CapEx Taxonomy-aligned (A.1) or Taxonomy-eligible (A.2), year 2023 (18)**	**Category — enabling activity (19)**	**Category — transitional activity (20)**
Text		*Euro*	*%*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*%*	*E*	*T*
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation using solar photovoltaic technology	CCM 4.1	3 285 993 €	1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1%		
Electricity generation from bioenergy	CCM 4.8	5 032 303 €	2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1%		
Cogeneration of heat and power from bioenergy	CCM 4.20	63 406 701 €	26%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	16%		
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	575 370€	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%		

Construction, extension and operation of waste water collection and treatment systems	CCM 5.3	1 045 892 €	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1%		
Close to market research, development and innovation	CCA 9.2	10 337€	0%	N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1%	E	
CapEx for environmentally sustainable activities (Taxonomy-aligned) (A.1)		73 356 596 €	30%	30%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	18%		
Of which, enabling activities		10 337€	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	E	
Of which, transitional activities		0 €	0%	0%						Y	Y	Y	Y	Y	Y	Y	0%		T

A.2. Taxonomy-eligible but environmentally unsustainable activities (Taxonomy non-aligned activities) (g)										
Forest Management	CCM 1.3	2 240 058 €	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	2%
High-efficiency co-generation of heat and power from fossil gaseous fuels	CCM 4.30	3 484 888 €	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	1%
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	279 679€	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0%
CapEx for taxonomy-eligible but environmentally unsustainable activities (Taxonomy non-aligned activities) (A.2)		6 004 624 €	2%	2%	0%	0%	0%	0%	0%	3%
A. CapEx for Taxonomy-eligible activities (A.1+A.2)		79 361 220 €	32%	32%	0%	0%	0%	0%	0%	21%
B. TAXONOMY NON-ELIGIBLE ACTIVITIES										
CapEx for Taxonomy non-eligible activities (B)		168 167 681 €	68%							
Total (A + B)		247 528 901 €	100%							

5.2.1.4.3. Proportion of OpEx on products or services associated with taxonomy-aligned economic activities

Financial year 2025	2025			Substantial contribution criteria						Criteria for DNSH ("do no significant harm") (h)									
Economic activities (1)	**Code (a) (2)**	**OpEx (3)**	**Proportion of OpEx, year N (4)**	**Climate change mitigation (5)**	**Climate change adaptation (6)**	**Water (7)**	**Pollution (8)**	**Circular economy (9)**	**Biodiversity (10)**	**Climate change mitigation (11)**	**Climate change adaptation (12)**	**Water (13)**	**Pollution (14)**	**Circular economy (15)**	**Biodiversity (16)**	**Minimum safeguards (17)**	**Proportion of OpEx Taxonomy-aligned (A.1) or Taxonomy-eligible (A.2), 2023 (18)**	**Category — enabling activity (19)**	**Category — transitional activity (20)**
Text		*Euro*	*%*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y; N; N/EL (b) and (c)*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*Y/N*	*%*	*E*	*T*
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation from bioenergy	CCM 4.8	3 459 650 €	4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3%		
Cogeneration of heat and power from bioenergy	CCM 4.20	3 443 711 €	4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3%		
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	969 373€	1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1%		
Construction, extension and operation of waste water collection and treatment systems	CCM 5.3	2 104 229 €	3%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3%		
Close to market research, development and innovation	CCA 9.2	3 754 638 €	4%	N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	4%	E	

Conservation, including restoration, of habitats, ecosystems and species	BIO 1.1	0 €	0%	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%		
CapEx for environmentally sustainable activities (Taxonomy-aligned) (A.1)		13 731 600 €	16%	12%	4%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	14%		
Of which, enabling activities		3 754 638 €	4%	0%	4%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	4%	E	
Of which, transitional activities		0 €	0%	0%						Y	Y	Y	Y	Y	Y	Y	0%		T
A.2. Taxonomy-eligible but environmentally unsustainable activities (Taxonomy non-aligned activities) (g)																			
Forest Management Dep.	CCM 1.3	3 364 613 €	4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								4%		
High-efficiency co-generation of heat and power from fossil gaseous fuels	CCM 4.30	257 821 €	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	293 985 €	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
OpEx for Taxonomy-eligible but environmentally unsustainable activities (Taxonomy non-aligned activities) (A.2)		3 916 419 €	0%	5%	5%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	5%		
A. OpEx in Taxonomy-eligible activities (A.1+A.2)		17 648 019 €	0%	21%	17%	4%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	19%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
OpEx in Taxonomy non-eligible activities (B)		66 034 895 €	79%																
Total (A + B)		83 682 914 €	100%																

5.2.1.4.4. Templates personalised in accordance with Regulation 2022/1214

Under the Taxonomy Regulation, Article 8 of the Delegated Act, standardised templates must be disclosed with regard to activities connected to nuclear energy and fossil gas.

Template 1: Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Row	**Fossil gas related activities**	
1.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
2.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
3.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

Row	Economic activities	Amount and proportion of Turnover					
		CCM + CCA		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the Turnover denominator**	94 273 513 €	5%	94 273 513 €	5%	0 €	0%
8.	**Total Turnover**	94 273 513 €	5%	94 273 513 €	5%	0 €	0%

Template 2: Taxonomy-aligned economic activities (denominator) - CapEx

Row	Economic activities	Amount and proportion of CapEx					
		CCM + CCA		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
7.	Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the CapEx denominator	73 356 596 €	30%	73 346 259 €	30%	10 337€	0%
8.	**Total CapEx**	**73 356 596 €**	**30%**	**73 346 259 €**	**30%**	**10 337€**	**0%**

Template 2: Taxonomy-aligned economic activities (denominator) - OpEx

Row	Economic activities	Amount and proportion of OpEx					
		CCM + CCA		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
7.	Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the OpEx denominator	13 731 600 €	16%	9 976 962 €	12%	3 754 638 €	4%
8.	**Total OpEx**	**13 731 600 €**	**16%**	**9 976 962 €**	**12%**	**3 754 638 €**	**4%**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

Row	Economic activities	Amount and proportion of Turnover					
		CCM + CCA		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover numerator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover numerator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover numerator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover numerator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover numerator	0 €	0%	0 €	0%	0 €	0%
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover numerator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the Turnover numerator**	94 273 513 €	5%	94 273 513 €	5%	0 €	0%
8.	**Amount and proportion of Taxonomy-aligned economic activities in the Turnover numerator**	94 273 513 €	5%	94 273 513 €	5%	0 €	0%

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

Row	Economic activities	Amount and proportion of CapEx					
		CCM + CCA		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx numerator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx numerator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx numerator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx numerator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx numerator	0 €	0%	0 €	0%	0 €	0%
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx numerator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the CapEx numerator**	73 356 596 €	30%	73 346 259 €	30%	10 337€	0%
8.	**Amount and proportion of Taxonomy-aligned economic activities in the CapEx numerator**	73 356 596 €	30%	73 346 259 €	30%	10 337€	0%

Template 3: Taxonomy-aligned economic activities (numerator) - OpEx

Row	Economic activities	Amount and proportion of OpEx					
		CCM + CCA		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx numerator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx numerator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx numerator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx numerator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx numerator	0 €	0%	0 €	0%	0 €	0%
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx numerator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the OpEx numerator**	13 731 600 €	16%	9 976 962 €	12%	3 754 638 €	4%
8.	**Amount and proportion of Taxonomy-aligned economic activities in the OpEx numerator**	13 731 600 €	16%	9 976 962 €	12%	3 754 638 €	4%

Template 4: Taxonomy-eligible but not Taxonomy-aligned economic activities - Turnover

Row	Economic activities	Amount and proportion of Turnover					
		(CCM + CCA)		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	4 272 801 €	100%	4 272 801 €	100%	0 €	0%
6.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the Turnover denominator**	0 €	0%	0 €	0%	0 €	0%
8.	**Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the Turnover denominator**	4 272 801 €	100%	4 272 801 €	100%	0 €	0%

Template 4: Taxonomy-eligible but not Taxonomy-aligned economic activities - OpEx

Row	Economic activities	Amount and proportion of CapEx					
		(CCM + CCA)		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	3 484 888 €	58%	3 484 888 €	58%	0 €	0%
6.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the CapEx denominator**	2 519 737 €	42%	2 519 737 €	42%	0 €	0%
8.	**Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the CapEx denominator**	6 004 624 €	100%	6 004 624 €	100%	0 €	0%

Template 4: Taxonomy-eligible but not Taxonomy-aligned economic activities - OpEx

Row	Economic activities	Amount and proportion of OpEx					
		(CCM + CCA)		Climate change mitigation (CMM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
2.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
3.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
4.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
5.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	257 821€	7%	257 821€	7%	0 €	0%
6.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%	0 €	0%	0 €	0%
7.	**Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the OpEx denominator**	3 658 598 €	93%	3 658 598 €	93%	0 €	0%
8.	**Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the OpEx denominator**	3 916 419 €	100%	3 916 419 €	100%	0 €	0%

Template 5: Taxonomy non-eligible economic activities - Turnover

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the Turnover denominator	0 €	0%
7.	**Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the Turnover denominator**	1 871 219 529 €	95%
8.	**Total amount and proportion of other Taxonomy-non-eligible economic activities in the Turnover denominator**	1 871 219 529 €	95%

Template 5: Taxonomy non-eligible economic activities - CapEx

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the CapEx denominator	0 €	0%
7.	**Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the CapEx denominator**	168 167 681 €	68%
8.	**Total amount and proportion of other Taxonomy-non-eligible economic activities in the CapEx denominator**	168 167 681 €	68%

Template 5: Taxonomy non-eligible economic activities - OpEx

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the OpEx denominator	0 €	0%
7.	**Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the OpEx denominator**	66 034 895 €	79%
8.	**Total amount and proportion of other Taxonomy-non-eligible economic activities in the OpEx denominator**	66 034 895 €	79%

5.2.1.4.5. The next steps in applying the Taxonomy

In line with the Group’s strategy and its sustainability goals, Navigator will press ahead in 2026 with developing procedures and action to respond appropriately to the Taxonomy alignment criteria. These activities include:

- More robust implementation of climate risk analysis (Appendix A to the Climate Delegated Act – Annex I) aligned with the work of responding to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD);
- Continued development of a Human Rights due diligence procedure, designed to strengthen practices and commitments relating to operations;
- Analysis of potential extensions of the Taxonomy regulations to other activities and implementation of guidelines that may have a significant impact on classification of the Group's eligibility and alignment in future.
- Monitoring of possible updates by European Commission to the Taxonomy Regulation, as a result of the Omnibus legislative package.

5.2.2. ESRS E1: Climate change

5.2.2.1. Strategy

5.2.2.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Emission of greenhouse gases (Scope 1).	Negative impact	--	Own operations	Mitigation of climate change
Emission of greenhouse gases (Scope 2).	Negative impact	--	Amount	Mitigation of climate change
Emission of greenhouse gases (Scope 3).	Negative impact	--	Upstream/downstream	Mitigation of climate change
Energy consumed from non-renewable sources in own operations contributes to climate change.	Negative impact	--	Upstream/Own operations	Energy
Undertake initiatives with our Stakeholders for climate change adaptation.	Positive impact	--	Upstream/downstream	Climate change adaptation
Capture and sequestration of CO_2.	Positive impact	--	Own operations	Mitigation of climate change
Production of renewable electricity contributes to the country's renewable energy mix.	Positive impact	--	Own operations	Energy
Development of bioproducts, as an alternative to other products that cause more pollution, contributes to the non-worsening of GHG emissions during the life cycle of use of these products (post-sales).	Positive impact	--	Downstream	Mitigation of climate change
Physical impacts of climate change, through extreme weather events (e.g. hurricanes, heavy rainfall).	Acute physical risk	Medium term - From reporting year and up to 5 years	Own operations	Climate change adaptation
Change in rainfall patterns and other climate factors leading to loss of yields in production forests.	Chronic physical risk	Long term - Over 5 years	Own operations/Upstream	Climate change adaptation
Climate change can lead to potential disruption of the supply chain and the consequent impact on the availability and quality of raw materials may compromise the Group's business.	Transition risk	Long term - Over 5 years	Amount	Climate change adaptation
Increase in severity and frequency of forest fires.	Chronic physical risk	Short term - Reporting year	Amount	Climate change adaptation
Rise in average sea level may lead to reduction of production capacity and revenue obtained and/or damage to operations.	Chronic physical risk	Long term - Over 5 years	Own operations	Climate change adaptation
Higher carbon price and reduction in availability of licenses under EU-ETS.	Risk	Medium term - From reporting	Own operations	Mitigation of climate change

		year and up to 5 years		
Increased energy costs associated with non-renewable sources.	Risk	Medium term - From reporting year and up to 5 years	Own operations	Energy
Adaptation of portfolio to impacts of climate change which respond to consumer preferences, reinforcing competitive advantage in the market and positively impacting revenues (e.g. NVG - Investment in R&D to develop new forest-based products able to substitute forest-based products, helping to mitigate climate change).	Opportunity	Medium term - From reporting year and up to 5 years	Own operations	Climate change adaptation
The transition to more sustainable technologies may lead in the long term to significant improvements in operational efficiency and cut overall operating costs, improving profitability and/or capturing an additional market share.	Opportunity	Long term - Over 5 years	Own operations	Mitigation of climate change
Substitution of fossil fuels by renewable fuels (e.g. biomass, solar and hydrogen)	Opportunity	Medium term - From reporting year and up to 5 years	Own operations	Mitigation of climate change
Investment in energy efficiency and renewable energy sources can lead to improved profitability.	Opportunity	Medium term - From reporting year and up to 5 years	Own operations	Energy

NB: the material impacts identified are actual, and so there is no associated time horizon. [E1.SBM-3.18]

Navigator has a comprehensive system for risk management, known as Enterprise Risk Management (ERM) (Chap. 3.3), which includes climate risks in its overall model for identifying, assessing and monitoring risks. In the ERM system, macro-risks of relevance to the climate are analysed on an integrated basis, comprising various risks factors which contribute to the overall assessment of each macro-risk, in line with the methodology applied to the Group's other risks.

In addition, for a specific set of three physical risks, one transition risk and one opportunity, all considered material for the business, Navigator has conducted and in-depth analysis, with the aim of quantifying the respective financial impacts. This was conducted in keeping with the TCFD recommendations, considering two time horizons (2035 and 2050) and three climate scenarios.

We present below: the scope of the resilience analysis; the methodology and the period for which the analysis was conducted; and the main findings, highlighting the conclusions from the analysis of scenarios. [E1.19a]

Scope of the resilience analysis

The resilience analysis focused on the physical and transition risks, as well as opportunities, assessing financial and operational impacts in two time horizons (2035 and 2050). The study encompasses physical risks, in particular forest fires, water scarcity, extreme weather events and impacts on forestry yields; transition risks, such as climate regulations, increased carbon cost (EU-ETS) and changing consumer preferences; and the opportunities included investment in new forest-based products and adoption of technologies to mitigate climate impacts.

How the resilience analysis was conducted

The resilience analysis was conducted by defining climate scenarios and was based on the IPCC RCP 2.6, RCP 4.5 and RCP 8.5 models. In keeping with the TCFD recommendations for scenario analysis, the company used **exploratory analyses** that describe a diverse range of plausible future states, which are used to assess potential climate-related risks and uncertainties, and also to test the resilience of our strategy for the different future conditions adjacent to these same scenarios. To this end, three climate scenarios were defined, considering two distinct time horizons: medium term (2035) and long term (2050). These climate scenarios were constructed on the basis of the IPCC scenarios, or Representative Concentration Pathways (RCP) – RCP 2.6, RCP 4.5 and RCP 8.5. These were complemented by narratives of plausible futures, from the Sustainable Development Scenario developed by the International Energy Agency and the Climate Scenario Tool for the food, forestry and farming products sector, developed by the WBCSD, respectively called the green, yellow and red scenario. In addition, a financial assessment was made of the impact of four climate risks and one opportunity, considering the three climate scenarios and two time horizons. Physical risks tend to be more severe in the 4ºC climate scenario (red scenario), given that in this scenario the likelihood of the occurrence and severity of extreme climate events is greater. However, in the 1.5°C and 2°C scenarios it is still possible that some physical risks will be moderately severe. The transition risks are general more severe in the scenarios which comply with the aims of the Paris Agreement, i.e. the 1.5ºC scenario (green scenario) and the < 2ºC scenario (yellow scenario).

The following table sets out the scenarios considered in the resilience analysis.

Scenarios	Description of narrative	Time horizon	Base Model
Green	**Rapid and orderly climate action.** • Economy grows sustainably, with heavy investment in renewable energy and low carbon technologies. • Political and regulatory transition makes for a balanced transition, with positive impacts for N. • Industry is gradually decarbonised, enabling business models to adapt, based on electrification of processes and use of renewable fuels based on green hydrogen. • Adoption of circular economy models, reducing dependence on fossil fuels. • Consumer preference for sustainable and certified products • Growing use of biomass, certified as renewable fuel. • Heavy investment in R&D in new forest-based products, replacing forest-based products.	2035-2050	• IPCC SSP 1- 2.6 (RCP 2.6) • WBCSD – 1.5ºC scenario based on innovation
Yellow	**Sudden and uncoordinated climate action** • Potential recession due to sudden measures to cut emissions. • Increased industrial costs due to increased carbon taxes and rigid regulation. • Negative impact on economic growth, with increased market volatility. • Renewable energies adopted abruptly, increasing transition cost. • Dependence on fossil fuels decreases, but without stable replacement solutions in the short term. • Increased investment in carbon capture and storage (CCS) technologies. • High adaptation costs due to regulatory pressure and need for high-speed innovation.	2035-2050	• IPCC SSP 2- 4.5 (RCP 4.5) • WBCSD – < 2ºC scenario based on planned policies
Red	**Slow and uncoordinated climate action (no mitigation)** • Continuation of traditional operational model, without effective decarbonisation policies. • Uneven economic growth, with rising operating costs due to extreme weather events.	2035-2050	• IPCC SSP 5-8.5 (RCP 8.5) • WBCSD – >3ºC scenario based on historical tendencies

	• Breakdowns in supply chains and increased uncertainty in financial markets. • Energy pattern remains dominated by fossil fuels, with only low-level implementation of renewables. • Significant increase in energy prices, undermining industrial competitiveness. • Lack of incentives for sustainable innovation, reducing adoption of clean technologies. • Poor adoption of decarbonisation technologies due to absence of government incentives. • Retention of traditional processes, but with rising energy and environmental costs.

When the resilience analysis was conducted

Our resilience analysis has been continuously perfected in order to ensure that climate risks and opportunities are integrated into our business strategy. In 2022, we published the first report aligned with the TCFD recommendations. In 2023, we updated our analysis of climate risks and opportunities, including a detailed financial assessment of four risks and one opportunity. In addition, a strategy review was conducted, ensuring that these elements and TCFD alignment are incorporated in Navigator's Enterprise Risk Management (ERM) system.

Findings of resilience analysis and impact of climate scenarios

The results from our analysis of climate scenarios suggest that our current strategy is resilient with regard to its ability to address climate risks and take advantage of related opportunities. Nonetheless, these results have enable us to identify critical areas to be monitored, in order to implement mitigation and adaptation measures and also targets to strengthen Navigator's resilience to climate change. [E1.19] In the future, we intend to continue to develop a more robust analysis of climate-related risks and opportunities, and also to make progress in the analysis of financial impacts from climate change on our business in line with our sustainable business strategy. [E1.AR7c]

				Climate Scenarios			
Risks		**Time horizon**	**Estimated impact (M€/year)**	**Green**	**Yellow**	**Red**	**Mitigation measures implemented / planned**
Physical risks	Change in precipitation patterns and other climate factors leading to loss of yields in forests managed by Navigator[29]	2035 2050	2-5	●●	●●●	●●●●●	• Geographical diversification of wood supply • Use of plants from genetic improvement programme • Sharing of technical know-how concerning best silviculture practices with Forestry producers • Explore other sources of raw material in order to ensure business continuity.
Physical risks	Water scarcity at the locations of	2035 2050	8-40	●●	●●●	●●●●●	• Implementation of Water Use Reduction Programme (WURP)

[29] Reduction in forest yields due to climate change (e.g. change in resulting pattern), based on analysis conducted internally by RAIZ for scenarios RCP 4.5 and 8.5. Annual impact calculated on the basis of opportunity costs associated with import of wood from outside Iberia, also considering lower pulp yields.

	the Group's industrial complexes[30]						• Assessment of reuse of industrial effluents in industrial processes • Assessment of new fresh water sources
Physical risks	Increase in severity and frequency of forest fires[31]	2035 2050	2.5-4	●	●●●	●●●●	• Geographical diversification of wood supply • Implementation of best silviculture practices for reducing the fire risk • Use best available technologies for fire fighting
Transition risks	Increased cost of emission licenses in EU-ETS system[32]	2035 2050	3-12	●●●●	●●●	●●●●	• Setting of specific targets for industrial operations based on climate science • Implementation of Navigator's Decarbonisation Roadmap
Potential financial impact of climate-related risks: 15.5 – 61 M€/year							

Key: ●●●●● Most severe ● Least severe

			Climate Scenario			
Opportunities	**Time horizon**	**Estimated impact (M€/year)**	**Green**	**Yellow**	**Red**	**Mitigation measures implemented / planned**
Investment in R&D to develop new forest-based products[33]	2035 2050	30-40	●●●●●	●●●	●	
Potential financial impact of climate-related opportunities: 30 – 40 M€/year						

Key: ●●●●● Most severe ● Least severe

We have demonstrated the capacity to adapt to climate change in the short, medium and long term, adjusting our strategy, business model and investment decisions so as to mitigate risks and take advantage of emerging opportunities. We have increased our access to financing by integrating ESG criteria into our financial decisions. Up to and including 2025, a total of six issues of sustainable debt were made under the Sustainability Linked Framework (Chap. 2.3). The terms of the loan are indexed to three ESG indicators envisaged in the Company's Sustainability Agenda, and also aligned with the United Nations Sustainable Development Goals. [E1.AR8b]

[30] Reduction in water withdrawal licenses as a result of less water being available in the drainage basins and aquifers from which Navigator supplies itself. Analysis based on hydrological modelling conducted by APA for RCP scenarios 4.5 and 8.5. Annual impact calculated on the basis of lost production resulting from lower volume of water authorised for withdrawal.

[31] Loss of wood in areas managed by Navigator as a result of forest fires. Annual impact calculated on the basis of opportunity costs associated with import of wood from outside Iberia, and historical data for burned area in past 10 years.

[32] Impact calculated on the basis of estimated in Navigator's Decarbonisation Roadmap, award of free licenses up to 2035 and CO_2 prices between 4 €/tCO_2 (red scenario) and 188 €/tCO2 (green scenario).

[33] Development of new forest-based products and solutions to replace fossil-based plastic is an opportunity that may represent new business areas for Navigator, in the short and medium term. In connection with the From Fossil to Forest Mobilising Agenda, Navigator has estimated potential Gross Value Added to be achieved in 2027 in relation to 2020 as a result of these new products.

In addition, climate risk management is built into the Company's financial assessments, ensuring greater stability in the valuation of assets and projection of cash flows. Alongside this, the Company is implementing a robust capex programme geared to decarbonisation, technological modernisation and energy efficiency. [E1.AR8b]

5.2.2.1.2. Transition plan for mitigating climate change (E1-1)

The transition plan for mitigating climate change plays a fundamental role in the way companies adapt their business models, making them compatible with target of limiting global warming to 1.5º, in line with the Paris Agreement. Our transition plan enables us to align our strategy and business model with the target of 1.5º set in the Paris Agreement, through a number of key initiatives [E1.14] indicated below: The transition plan has been approved by the administrative, management and supervisory bodies. [E1.16i]

Climate scenario analysis and risk management: the analysis of climate-related risks and opportunities was conducted using three climate scenarios, including the 1.5ºC scenario (RCP 2.6, comparable with SSP1-2), assessing the resilience of the strategy in the face of possible regulatory and market changes. The assessment was conducted in accordance with the recommendations of the Task-Force on Climate-related Financial Disclosures (TCFD). [E1.14]

Design of a decarbonisation roadmap: sets three specific targets for cutting the GHG emissions from our activities: 86% cut in EU-ETS emissions by 2035, in relation to 2018; 63% cut in absolute scopes 1+2 emissions by 2035, in relation to 2020 and 37.5% cut in absolute scope 3 emissions by 2035, in relation to 2020, the last two targets having been approved by SBTi in 2022. The target for scopes 1 and 2 is aligned with the 1.5ºC target set by the Paris Agreement. [E1.14]

Investment in renewable energy: Under its Climate Transition Plan, the Group is implementing an ambitious programme of projects to replace fossil fuels with sustainable biomass and to expand both renewable cogeneration using biomass and solar power generation. The Plan also includes ongoing analysis of the solutions and technologies available on the market, so as to identify those best able to contribute to energy efficiency and to reducing emissions. At the same time, Navigator has worked to generate energy using by-products from pulp production processes for which no other use is found, such as biological sludges from Waste Water Treatment Plants (WWTPs) and sawdust from chipping operations, adding to the circularity and sustainability of its operational model. These capital projects will enable a significant reduction in scopes 1 and 2 emissions, accelerating the decarbonisation of operations and strengthening the Group’s commitment to a competitive and low carbon energy transition. [E1.14]

Shutdown of natural gas cogeneration plants: in line with the Decarbonisation Roadmap, we plan to shut down the two Natural Gas Cogeneration Plants operated by the Group, by 2035. The cogeneration plant in Figueira da Foz has been operating on a backup basis since 2021, since the start-up of the new Biomass Boiler that year. The new Recovery Boiler in Setúbal, which started up in 2025, has enabled us to speed up the process of phasing out use of the Natural Gas Cogeneration Plant at this complex. The facility now only operates with one of its two generator sets, and is planned to be shut down completely by 20235. [E1.14]

Carbon capture and sustainable forestry management: Sustainable management of approximately 138 thousand hectares of forests, in mainland Portugal and Mozambique, enables us to point to a corresponding carbon stock of approximately 11 Mt CO_2e. [E1.14]

Compatibility of goals with limiting warming to 1.5ºC

[E1.16a | E1.34f]

Embracing an active role in the search for solutions for the climate challenge, we set two climate science-based targets in 2022 for reduction of greenhouse gas (GHG) emissions. We set near-term targets of a 63% reduction in scopes 1 and 2 GHG emissions and a 37.5% reduction in scope 3 emissions by 2035, in relation to 2020 levels. The targets, approved by SBTi, are consistent with the ambition to reduce GHG emissions to the levels needed to limit global warming to 1.5ºC, in the case of scopes 1 and 2 emissions,

and well below 2°C, in scope 3 emissions. The targets were set on the basis of decarbonisation trajectories in the sector and the wider economy, ensuring conformity with scientific climate principles. [E1.16a]

Climate scenarios were analysed on the basis of the IPCC's 1.5°C scenario (RCP 2.6) and the Sustainable Development Scenario of the International Energy Agency (IEA).

This approach ensures a balanced transition, guaranteeing that climate action is compatible with sustainable development principles. [1.16a]

The approach to analysis of climate scenarios, risk and opportunities assessment and target setting has been aligned with the Forest Sector Net-Zero Roadmap of World Business Council for Sustainable Development (WBCSD), a benchmark mapping a credible decarbonisation trajectory for the sector. We continue to monitor developments in terms of climate science, especially the GHG Protocol and SBTi benchmarks for the sector. [E1.16a]

It should be noted that the Company is not excluded from EU benchmark indicators aligned with the Paris Agreement. [E1.16g]

Decarbonisation levers

Our climate transition plan is based on several levers and actions for cutting GHG emissions, aligned with the targets and strategy for climate change mitigation. The main measures adopted include operational optimisation, implementation of new technologies and changes to the product portfolio, advancing the transition to a low-carbon economy. The main decarbonisation levers and actions include the energy transition and the adoption of renewable energy, improved operational efficiency, adaptation of the portfolio of products and services, sustainable forestry management and carbon sequestration, as well as implementation of initiatives throughout the value chain. [E1.16b | E1.16h]

Energy transition and adoption of renewable energy

Navigator is firmly committed to the energy transition at its industrial complexes, promoting the adoption of renewable fuels, in particular biomass aligned with the RED III sustainability criteria, in order to replace fossil fuels. In 2025, this strategy was visible in the conversion of two lime kilns, one in Aveiro and the other in Setúbal, replacing fossil fuels with biomass. In addition to eliminating the use of fossil fuels, the kilns are now able to use sawdust, a by-product from wood chipping operations. The new lime kiln in Figueira da Foz, which also started up in 2025, was designed from scratch to use biomass as its main fuel.

The same approach is being taken with the new biomass boiler in Vila Velha de Ródão, due to start up in 2026, enabling a 50% reduction in the natural gas consumption of this complex.

At the same time, the Group continues to invest in highly efficient technologies, in particular the new recovery boiler at the Setúbal Industrial Complex, operational since the first half of 2025. As well as boosting efficiency in countless ways, the new facility features auxiliary burners designed to consume a blend of natural gas and renewable hydrogen. In addition, the group has converted the auxiliary fuel oil burners in the recovery boilers in Aveiro and Figueira da Foz to equivalent burners.

We are also committed to producing renewable electricity, by expanding our current high efficiency cogeneration facilities and installing new solar power facilities for in-house consumption, helping to bring down scope 2 emissions. The new turbogenerator started operation in 2025, generating power from biomass at the Figueira da Foz Industrial Complex. This facility, supplying the complex's own needs, reduces the need for power purchases and has improved the efficiency of the associated renewable cogeneration plant. Also in 2025, the new solar facility started up at Vila Velha de Ródão. Phase 1 has capacity of 5.3 MWp, and phase 2 is planned for completion in 2026 with combined capacity of 9.4 MWp. These renewable power projects have been supported by the Recovery and Resilience Programme, under the scheme to promote Industrial Decarbonisation.

Operational Efficiency

In addition to the energy transition, Navigator has been working to implement operational efficiency projects at its industrial complexes in order to optimise energy intensity on an ongoing basis. The 10 energy efficiency projects completed present a potential annual energy reduction of 5.3 Gwh, helping to optimise resources. [E1.16b]

Adaptation of product and service portfolio

Under its Climate Transition Plans and in line with the overall aim of limiting warming to 1.5°C, The Navigator Company has been adapting its portfolio and working to diversity in to renewable and low carbon products, as part of its strategy of resilience and creating sustainable value. The investment in the packaging segment, with the development of gKRAFT solution, has represented a significant move forwards, offering alternatives to fossil-based plastics and helping to replace them with recyclable materials obtained from renewable sources. Alongside this, investment in moulded cellulose tableware, produced at the Aveiro Industrial Complex, points to the Company's commitment to accelerating the transition to circular and sustainable products. This type of solution presents significant environmental benefits, and can generate up to three times[34] less greenhouse gas emissions, when compared with utensils manufactured from conventional polypropylene, boosting the role of Navigator's portfolio in climate mitigation and in promoting alternatives aligned with a low-carbon economy. [E1.16b]

Sustainable forestry management and carbon sequestration

Sustainable management of 139 314 hectares of forest plays a fundamental role in mitigating climate change. Among other advantages, this makes it possible to sequester approximately 11 Mt of CO_2eq[35]. In addition, the cellulose and paper products marketed by Navigator make it possible to store approximately 3.8 Mt CO_2eq. Although no changes have occurred in processes, which continue to permit incorporation of CO_2 from our operations in the production of PCC, the regulatory change introduced by Delegated Regulation (EU) 2024/2620 means this CO_2 is no longer counted for EETS purposes. This change corresponds to a value of 13 to 18 ktCO_2/year of licenses abated in recent years, impacting the comparison of emissions in relation to the baseline as from 2025. [E1.16b]

Initiatives along the value chain

As part of our decarbonisation commitment and in with the target of a 37.5% reduction in scope 3 emissions, The Navigator Company has stepped up measures to promote emission cuts throughout the value chain. Since 2023, we have included sustainability criteria in our Supplier assessments, using specialist ESG assessment platforms which analyse the performance of companies on environmental, social and governance issues, on the basis of public information and internationally recognised methodologies. In 2025, we also started to apply a questionnaire aimed at materially relevant Suppliers, in order to gather information on the carbon footprint, water footprint, alignment with good environmental and social practices, and other matters. Initially, this questionnaire was sent to small but materially relevant group of Suppliers of chemicals and packaging, and a response rate of 25% was obtained. This initiative enables us to learn more about our value chain and to assess, collaboratively, the impacts, risks and opportunities related to our activities, laying the foundations for developing a joint action plan for the climate transition. At the same time, we have been working to mitigate emissions in logistical flows, in both upstream and downstream transport, by optimising routes, promoting intermodal solutions and stepping up partnerships with operators which adopt more sustainable transport practices. [E1.16b]

In 2025, we published an **Internal travel policy**, applicable to work-related travel by our Employees. This policy lays down a series of rules and guidelines which seek to standardise the procedures for work-related travel, whilst also promoting more responsible and sustainable travel options. Although the emissions associated with these activities are not materially relevant in

[34] According to research conducted by Navigator on the basis of the information available in the ecoinvent data base.

[35] Accumulated stock in forests in Portugal and Mozambique.

Navigator's wider context, implementation of this Policy, and also of the improvements made to the booking platforms, in particular the possibility of sharing journeys, help to reduce scope 3 emissions associated with this type of travel.

Investment and financing supporting execution of transition plan

Our decarbonisation roadmap is ambitious and requires action throughout the value chain. In the context of scopes 1 and 2 emissions, the roadmap includes a set of 23 initiatives, of which 17 are supported by the Recovery and Resilience Plan (RRP) and one by the Innovation Fund - the European Union fund for climate policy, focusing especially on energy and industry. It should be noted that we have so far concluded 19 of the proposed initiatives, and the remaining four are nearing completion. Execution of the 23 initiatives is estimated to represent investment in excess of 352 million euros in the period 2019-2028. We have also implemented a series of energy efficiency measures, including improvements to production systems for compressed air, optimisation of cooling systems, installation of LED lighting and changes to improve the thermal efficiency of processes, among other things. These initiatives have also made it possible to optimise consumption of energy from primary sources per ton of manufactured output. [E1.16c]

Main CapEx projects in decarbonisation in 2025

Twenty twenty-five saw the execution and conclusion of a wide-ranging programme of projects in the **Decarbonisation Roadmap**, supported by the RRP and the Innovation Fund. This amounted to an extraordinary success in allocating resources for this purpose. Ten projects were completed, most notably:

i. Lime production from biomass, through conversion of the 2 kilns in Setúbal and Aveiro and installation of a new lime kiln in Figueira da Foz, which together will make it possible to avoid direct fossil CO_2 emissions of 43 $ktCO_2$/year.

ii. Installation of a new recovery boiler in Setúbal, complemented by a system for burning non-condensable gases, making it possible to shut down a generator set in the combined-cycle natural gas plant at the site.

iii. Increase in renewable cogeneration capacity with the installation of a new steam turbogenerator in Figueira da Foz, with capacity of 3.2 MW and annual estimated power output of 15.2 GWh.

As part of the **Energy Efficiency Plan**, in 2025, we concluded a structured set of 10 measures, divided between the Groups' different industrial units, representing total investment of 1.4 million euros. The measures implemented over the year involved various types of action, including installation of efficient lighting, heat recovery measures, optimisation of heat and steam systems, increased production of renewable energy, improvements to compressed air systems, and initiatives to modernise drives and efficient controls, based on implementing variable speed drives. Altogether, these measures represent an annual energy saving estimated at 5.3 GWh. The approach taken is aligned with Navigator's Energy Management System, certified under ISO 50001, which ensures continuous improvement of performances and underpins the Company's commitment to pursuing energy efficient and environmentally-friendly solutions. Changes relating to thermal systems included the start-up of the second reboiler at the Vila Velha de Ródão tissue plant. This solutions is based on reusing residual heat from flue gases, making it possible to produce steam with reduced dependence on natural gas. This measures directly contributes to cutting CO_2 emissions, to improved overall thermal efficiency in the unit and increased energy resilience, providing a clear example of the adoption of innovative solutions geared to decarbonisation and optimisation of production systems. [E1.16c | E1.16e | E1.16f]

ESG initiatives undertaken in 2025, including investment in decarbonisation projects, represented approximately 60% of total CapEx, corresponding to around 126.8 million euros. [E1.16c]

Future CapEx plans

We remain committed to identifying and analysing new technological solutions which can be translated into initiatives for inclusion in the Decarbonisation Roadmap, so as to eliminate future emissions associated with industrial assets and processes. We are

actively seeking to achieve the commitments made in the 2030 Agenda in relation to climate change, in particular by cutting scopes 1, 2 and 3 emissions. A series of initiatives have been identified, currently at the drawing board stage, which will enable us to achieve the goals set. This group of new initiatives includes investment in biomass as an alternative fuel, but also electrification of heat consumption and adoption of innovative solutions for harder-to-abate fossil fuel consumption.

Progress in implementation of the transition plan

The progress made in implementing our transition plan is witnessed by the reduction in emissions, growth in the use of renewable energy and the channelling of investment to sustainable initiatives.

In relation to the reduction of GHG emissions, by 2025 we achieved a 37% reduction in direct EETS (European Emissions Trading Scheme) emissions, in comparison with 2018 levels. This performance was achieved thanks to implementation of the projects envisaged in the Decarbonisation Roadmap, pointing to Navigator's progress in attaining its goals.

However, the increase of around 7% in these emissions in relation to 2024 was due above all to the regulatory change introduced by Delegated Commission Regulation (EU) 2024/2620 of 20 July 2024, meaning that CO_2 captured in PCC for use in paper production is no longer counted. In recent years, this item corresponded to around 13 to 18 $ktCO_2$/year in abated licenses, and from 2025 onwards resulted in an increase in emissions in relation to the baseline. In addition, the operational difficulties experienced at the Setúbal industrial complex also helped to push up emissions in relation to the previous year.

In the context of the SBTi targets, we achieved a reduction of 39% scopes 1 and 2 emissions in relation to the baseline year. In comparison with 2024, there was a reduction of approximately 4%, thanks to a decrease in power purchases for the Aveiro pulp mill, as a result of the renewable cogeneration plant switching to production for internal consumption. There was also a significant reduction in 2025 in the emissions factor for electricity in Portugal, reflecting the increased incorporation of renewables in the national energy mix. [ESRS 2.80j]

With regard to scope 3 emissions, which encompass emissions associated with the supply chain, transport and product life cycle, there was an increase of 5% in relation to the baseline year and a reduction of 4% in relation to 2024. In this area we have made significant improvements in the collection, analysis and quantification of emissions, and in particular identified more appropriate emissions factors, more precise estimates of kilometres travelled and more complete calculation methodologies, in relation to emissions for processing and end-of-life treatment of sold products (C10 and C12, respectively) [ESRS 2.80j]

With this trajectory, the Company remains on course to achieve its decarbonisation targets by 2035. [E1.16j | ESRS 2.80j]

In relation to the transition to renewables, in 2025, 79% of all primary energy consumed by Navigator, both globally and in Portugal, was obtained from renewable sources, in particular biomass and photovoltaic solar power. [E1.16j | ESRS 2.80j]

Energy consumption per ton of output in Portugal increased by 7% in relation to 2024. This was due to a change in the methodology for calculating consumption of energy obtained from black liquor, which now reflects a higher energy content, albeit from a renewable source. In addition, output was slightly down on 2024 (-1%). [ESRS 2.80j]

The Company’s climate action was recognised in 2025 by Carbon Disclosure Project (CDP), earning it a score of "A", which confirms it as a leader in climate performance. In addition, the Company remains aligned with international frameworks, such as the Science Based Targets (SBTi) initiative and the Task Force on Climate-related Financial Disclosures (TCFD). [E1.16j]

5.2.2.2. Management of impacts, risks and opportunities

5.2.2.2.1. Policies related to climate change mitigation and adaptation (E1-2, MDR-P)

Navigator's policies and strategies reflect a wide-ranging commitment to sustainability and response to climate change, most notable its **Environmental Policy** and the **Management Systems Policy**. The **Environmental Policy** and the **Decarbonisation Roadmap** are framed by the Company's Purpose, establishing commitments for the Climate and Nature, in keeping with the materially relevant topics in Navigator's 2030 Agenda and contributing to the successful implementation of the UN Sustainable Development Goals (SDGs). They focus on mitigating climate change, promoting reduction of greenhouse gas emissions and encouraging investment in renewable energy and efficient processes. In particular, they lay down the following commitments [E1.25]:

- To take an active role in the low-carbon economy, in line with current scientific knowledge, through sustainable management of its forests, investment in renewable energy sources and improving the efficiency of its processes, products and services.
- To reduce greenhouse gas emissions (GHG) with a view to achieving carbon neutrality, in line with the aims of climate action as set out in the Paris Agreement.
- To incorporate climate risk assessments in the decision-making process, in line with European recommendations and the main international frameworks.
- To achieve, systematically, improved energy performance and optimisation of processes.

The **Management Systems Policy** sets out Navigator's general commitments in relation to its quality environmental, energy and safety management systems. This stresses the adoption of best available techniques for improving environmental performance - which includes energy performance and adoption of efficient and sustainable practices - and encourages Suppliers to develop products and services which are aligned with the Company's requirements and aims. [ESRS 2.65a | E1.25] Complementing this, it may be noted that the **Forestry Policies** (Chap. 5.2.6) and **PG 80 -** Management of Environmental Issues address climate change adaptation, ensuring the resilience of ecosystems and effective management of the environmental impacts associated with the Company's operations. [E1.25]

Document	Environmental Policy
Key content and goals [ESRS 2.65a]	In line with the principles of prevention, mitigation and remediation of the actual and potential impacts of operations, with the requirements to which the Company has signed up voluntarily and with all the applicable obligations to comply with the law, this lays down Navigator's general commitments on environmental matters. It also includes specific content on: climate change and CO_2 sequestration; water management; circular economy; energy and raw material management; sustainable forestry management and biodiversity conservation.
Scope [ESRS 2.65b]	It applies to Navigator's own operations and has impacts upstream and downstream in the value chain, on Suppliers and local Communities. It covers all geographical regions and Navigator's business areas.
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	UN Fundamental Right of access to a clean environment
Availability	Available on the *Intranet* and online.

[ESRS 2.65f]	
References over the course of the non-financial statement	• E3 – Water and marine resources (Chap. 5.2.3) • E4 – Biodiversity and ecosystems (Chap. 5.2.4) • E5 – Use of resources and circular economy (Chap. 5.2.5) • Sustainable forest management (Chap. 5.2.6)

Document	Decarbonisation Roadmap
Key content and goals [ESRS 2.65a]	Roadmap setting targets and goals for mitigating climate change in Navigator's industrial activities.
Scope [ESRS 2.65b]	Addresses own operations, relates to internal Stakeholders and covers all industrial units in Portugal and Spain.
Most senior level responsible for implementation [ESRS 2.65c]	Director responsible for Energy
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	SBTi
Availability [ESRS 2.65f]	Available on the Intranet.

5.2.2.2.2. Actions and resources in relation to climate change policies (E1-3, MDR-A)

In order to achieve the goals established, we allocate resources under our policies related to climate change, both to initiatives already under way and to those planned for implementation. The 10 actions which were concluded in 2025 represent capital outlay (CapEx) of 228.4 million euros, over the various years of execution. [ESRS 2.69a]

In addition, significant efforts were made to implement projects over the course of 2025, requiring extraordinary allocations of resources, both financial and human. This efforts included involving operation and maintenance teams in the start-up of new facilities, provision of a large number of training hours in order to prepare the teams to operate and maintain the facilities, and also adoption of low carbon technologies and industrial decarbonisation solutions. [ESRS 2.69a]

The last 4 initiatives still being implemented under the RRP will be completed in 2026. In Aveiro, a new steam turbogenerator will start up to serve the tissue mill, with capacity of 15.0 MW, representing total CapEx of 18.7M€. In Vila Velha de Ródão, work will be completed on the new biomass boiler and phase two of the solar facility installed on the ground, representing total investment of approximately 14 M€. In Setúbal, the auxiliary burners of the biomass boiler will be converted to use natural gas and hydrogen (up to 20%), replacing the current fuel (fuel oil). In addition, the initiatives completed in late 2025 will entail a learning and consolidation period over the course of 2026, and it is expected that they will result in GHG emission reductions in the full year figures for 2026. [ESRS 2.69a]

The following table presents a detailed description of the actions carried out and planned, including scope (own operations), time horizon and the results already achieved or expected.

Main actions: [ESRS 2.68a]	***Status*** [ESRS 2.68a]	**Scope of action** [ESRS 2.68b]	**Time horizon** [ESRS 2.68c]	**Results** [ESRS 2.68 to ESRS 2.68e]
Actions aimed at reducing scope 1 emissions				
New recovery boiler in Setúbal	Executed	Own operations, in Setúbal	2025	101 000 tCO_2/year
New system for collection and incineration of non-condensable gases, Setúbal	Executed	Own operations, in Setúbal	2025	25 000 tCO_2/year
New biomass-fuelled lime kiln, Figueira da Foz	Executed	Own operations, in Figueira da Foz	2025	9 000 tCO_2/year
Adaptation of recovery boiler burners to H_2, Aveiro	Executed	Own operations, in Aveiro	2025	2 000 tCO_2/year
Conversion of lime kiln to biomass, Aveiro	Executed	Own operations, in Aveiro	2025	9 000 tCO_2/year
Conversion of lime kiln to biomass, Setúba	Executed	Own operations, in Setúbal	2025	15 000 tCO_2/year
Installation of reboiler for steam production at PM2, Vila Velha de Ródão	Executed	Own operations, in Vila Velha de Ródão	2025	600 tCO_2/year
New biomass boiler, in Vila Velha de Ródão	Planned	Own operations, in Vila Velha de Ródão	2026	11 000 tCO_2/year
Adaptation of biomass boiler burners to H_2, Setúbal	Planned	Own operations, in Setúbal	2026	3 000 tCO_2/year
Actions aimed at reducing scope 2 emissions				
New rooftop solar facility, Vila Velha de Ródão	Executed	Own operations, in Vila Velha de Ródão	2025	600 tCO_2/year
New steam turbine for paper mill, Figueira da Foz	Executed	Own operations, in Figueira da Foz	2025	2 000 tCO_2/year
Energy efficiency projects	Executed	Own operations	2025	200 tCO_2/year
Energy recovery from biological sludges in recovery boiler, Aveiro	Executed	Own operations, in Aveiro	2025	600 tCO_2/year
New steam turbine for tissue mill, Aveiro	Planned	Own operations, in Aveiro	2026	11 000 tCO_2/year
New solar facility installed on ground, Vila Velha de Ródão	Planned	Own operations, in Vila Velha de Ródão	2026	800 tCO_2/year
Actions aimed at reducing scope 3 emissions				
Outbound logistics	Executed and planned	Upstream value chain operations	Ongoing action	600 tCO_2/year

Note 1: Estimated figures considering 1 full year of operation

Alongside the measures described above, Navigator works continuously, in close collaboration with its suppliers, to promote synergies to contribute to reduction of scope 3 emissions throughout the value chain. In this context, we may point to initiatives to encourage less carbon intensive production solutions, such as the three-way project for incorporating biomass in the production of lime used in manufacturing precipitated calcium carbonate (PCC). Steps have also been taken to optimise materials and logistics, including using thinner corrugated cardboard packaging, purchasing chemicals in higher concentrations (reducing the number of transport journeys) and logistical optimisation through the partnership with PCL (Pulp Chem Logistics). In addition, we have continued to support hauliers in renewing their road fleets and wood and biomass suppliers in the acquisition of more efficient forestry equipment, as well as making greater use of rail haulage, contributing to a reduction in the emissions associated with the transport of raw materials.

The following information is incorporated by reference to other parts of the Annual Report:

- Further information on the relationship between the current financial resources allocated to these actions or action plans and the most significant figures in the financial statements (ESRS 2.69b): Nos. 3.2, 3.3, 3.6 of the Notes to the Financial Statements.

5.2.2.3. Targets and metrics

5.2.2.3.1. Targets related to climate change mitigation and adaptation (E1-4, MDR-T, MDR-M)

In our 2030 Roadmap (Chap. 3.4.4), we have set **six targets** relating to **climate change mitigation and adaptation**, in line with the IROs identified. [E1.33] By 2035, we aim to achieve a reduction of 86% in direct EETS emissions of CO_2 at our industrial complexes, and also to reduce scopes 1 and 2 GHG emissions by 63% and scope 3 GHG emissions by 37.5%. Another of our targets is to optimise energy intensity, with efforts to improve efficiency on an ongoing basis and ensure that 80% of the primary energy consumed is from renewable sources. Attention is drawn to the objective of developing cloned plants and improved seeds, able to boost yields by between 30% and 50% and of offering greater resilience to climate change.

The targets set for reducing CO_2 emissions are directly aligned with our **Decarbonisation Roadmap** and **Environmental Policy**, reflecting NVG's commitment to sustainability and reducing GHG emissions. These have been established in line with the Company's own operations in Portugal and Spain, involving participation by internal Stakeholders, the Environmental Board, the Community Monitoring Committees, the Faculty of Science and Technology at Nova University Lisbon and the SBTi. [ESRS 2.80 | ESRS 2.80c/g/h]

The following table shows the different targets set and the progress achieved.

Goal and target [E1.34a and 34b]	**% covered, by scope** [E1.34b]	***Baseline*** [E1.34c]	**Associated metrics**	**Performance 2023** [E1.34a and 34b and ESRS 2.80j]	**Performance 2024** [E1.34a and 34b and ESRS 2.80j]	**Performance 2025** [E1.34a and 34b and ESRS 2.80j]	**Target to achieve** [E1.34d and ESRS 2.80b]
Cut direct EETS CO_2 emissions by 86%	89% scope 1	774 464 tCO_2 Baseline: 2018	Scope 1 EETS	-41% 457 990 tCO_2	-42% 452 756 tCO_2[36]	-37% 485 054 tCO_2	-86% Year: 2035
Cut scopes 1 and 2 GHG emissions by 63%	91% scope 1 96% scope 2 location-based[37]	937 710 tCO_2e Baseline: 2020	Scope 1+2	-26% 698 715 tCO_2e	-36% 599 397 tCO_2e	-39% 572 079 tCO_2e	-63% Year: 2035
Cut scope 3 GHG emissions by 37.5%	69% scope 3[38]	958,266 tCO_2e Baseline: 2020	Scope 3	+7% 1 142 275 tCO_2e	+10% 1 050 577 tCO_2e	+11% 1 059 752 tCO_2e	-37.5% Year: 2035
Optimise energy intensity, year after year	-	Baseline: 2020	Energy intensity	12.9 GJ/t	12.7 GJ/t	13.7 GJ/t	Year: 2030
Increase use of renewable energy as proportion of total primary energy consumption	-	70% Baseline: 2020		80%	80%	79%	80% Year: 2030
Develop genetically improved clones and seeds, with gains in yields and resilient to climate change	-	-	Gain in volume and pulp (%), Genetic diversity (no. of hybridisations, no. of clones delivered or other diversity indicator).	Incorporation of 29 lots of seeds for 24 species through importation and collection at Portuguese "Escaroupim" arboretum, to increase diversity in Genetic Improvement Programme in the long term through hybridisation with *E. globulus*.	3 new clones delivered in the Viveiros Aliança portfolio, with a genetic gain of 41% (volume and pulp), all resistant to *Neopestalotiopsis*, and two with known resistance to *Ophelimus*.	In the E. globulus seed orchard, 250 kg of capsules were gathered, which will produce around 1 kg of improved seed, resulting in some 300 000 plants to be used in forestry operations. Measurements were taken in 18 trials which enable genetic analysis of 146 new clones (15 of them hybrids) and 39 new families (4 of them hybrids). These materials contribute to PMG diversity and enable us in the medium/long term to recommend new, diversified clones with better yields which will contribute to the resilience of the eucalyptus forest.	Maintain gains in volume and pulp (30-50%) and/or enrich genetic diversity (for biotic and abiotic factors).

As part of the goal of an 86% reduction in EETS emissions by 2035, an interim target was set of 31.5% by 2027. This target was exceeded two years running, and so we now regard it as attained. [ESRS 2.80e]

[36] Figure corrected through EETS verification (previous figure 454 234 tCO_2) [ESRS 2.13]

[37] The following emissions sources are excluded from scope 1: i) emissions associated with fluorinated gases; ii) own fleet; iii) CH_4 and N_2O associated with fertiliser use, representing approximately 4% of inventory.

[38] The following categories were considered: Category 1, excluding emissions associated with purchases of PCC, pulp, services, wood and waste forestry biomass; and categories 3, 4, 9, 10 (emissions related to processing pulp into UWF and tissue) and 12 (50% of emissions associated with landfill disposal).

In relation to the **target calculation methodology**, the reduction in direct EETS emissions of CO_2 from industrial complexes has been defined in accordance with the European Emissions Trading Scheme Directive. In addition, the two targets relating to scopes 1, 2 and 3 emissions have been set on the basis of the principles of the GHG Protocol and aligned with the SBTi initiative. [ESRS 2.80f] The targets set and validated by SBTi encompass all of Navigator's activities. [E1.34b]

No **changes** were made to the value of the targets, the year set for attainment, the calculation or data collection methodology or to the assumptions, sources or limitations, in relation to the previous reporting period. [ESRS 2.80j]

The **baseline years** for the targets, 2018 and 2020, were selected as being periods which are representative of the Company's operations, with production levels in line with the average for the previous five years. [E1.AR25a]

The reference **target values** aligned limiting global warming to 1.5ºC for scopes 1 and 2 were calculated on the basis of the methodology and tool provided by SBTi. [E1.AR26]

The progress made in the past in order to achieve the goals established prior to the current reference year is documented in the 2030 Roadmap (Chap. 3.4.4). [E1.34c]

We set out **decarbonisation targets** in the light of various future scenarios, including changes in consumer preferences, the evolution of regulations and new technologies. The business diversification plan and product portfolio that the company has implemented in its sustainable business strategy ensures that the strategy for transition to a low carbon model is robust and adaptable to different future scenarios. [E1.34e]

5.2.2.3.2. Energy consumption and mix (E1-5)

	[E1.37/38] Energy mix	Total 2025 (MWh)	Total 2024 (MWh)
[E1.38a]	Fuel consumption from coal and coal products	0	0
[E1.38b]	Fuel consumption from crude oil and petroleum products	240 689	240 757
[E1.38c]	Fuel consumption from natural gas	2 161 783	2 050 398
[E1.38d]	Fel consumption from other fossil sources	37 786	39 973
[E1.38e]	Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	308 287	346 079
[E1.37a]	**Total energy consumed from fossil sources**	**2 748 545**	**2 677 206**
[E1.37b]	**Total energy consumed from nuclear sources**	88 558	**123 061**
[E1.37ci]	Fuel consumption for renewable sources including biomass	8 994 991	8 943 195
[E1.37cii]	Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	799 219	898 251
[E1.37ciii]	Consumption of self-generated non-fuel renewable energy	17 904	10 938
[E1.37c]	**Total energy consumed from renewable sources**	**9 812 114**	**9 852 383**
[E1.37]	**Total energy consumption**	**12 649 217**	**12 652 651**
[E1.AR34]	Fossil sources as a % of total energy consumption	21%	21%
[E1.AR34]	Nuclear sources as a % of total energy consumption	1%	1%
[E1.AR34]	Renewable sources as a % of total energy consumption	78%	78%

Note 1: The energy consumption reported includes primary and electrical energy consumed in all geographical regions where Navigator operators, excluding power consumption at international offices, due to its low materiality. Consumption at industrial facilities represents 99.9% of the Group's total consumption, and the rest is divided between forestry operations, offices in Portugal and Employee mobility.

Note 2: Electricity and natural gas consumption is measures using the specific meters manager by the network operator, whilst fuel oil and biomass consumption is determined using the weighbridges at the industrial complexes.

Note 3: The net calorific value (NCV) of fuels is considered in accordance with the EETS Regulation. Black liquor is quantified using flow meters at the entrance to the recovery boiler. Up to 2024, we used the black liquor NCVs indicated in the EETS Regulations; in 2025, we switched to using laboratory measured NCVs, reflecting a stricter approach, more closely adjusted to Navigator's production profile.

Note 4: Energy consumption related to Employee mobility estimated on basis of kilometres recorded on the respective platforms or, where applicable, on the basis of invoiced costs.

Note 5: The most significant methodological changes in 2025 were the alteration in how the black liquor NCV is determined and integration of a full year of operation of Navigator Tissue UK.

At the three pulp mills, Navigator produces renewable electricity from biomass in high efficiency cogeneration facilities. In addition, it has two biomass power plants dedicated to the sale of electricity, located in Aveiro and Setúbal, respectively. It also produces renewable power at ten solar power facilities for in-house consumption, located at the industrial complexes in Aveiro, Figueira, Setúbal and Ejea, as well as at Instituto RAIZ and at the Espirra Estate; a solar facility has also been operating at the site in Vila Velha de Ródão since 2025. In addition, in Setúbal and Figueira da Foz, power is generated in two combined-cycle natural gas plants, although the plant in Figueira da Foz is currently operating only on a back-up basis.

	Power generation	Total 2025 (MWh)	Total 2024 (MWh)
[E1.39]	Total power generation	1 325 440	1 373 621
[E1.39]	Electricity produced from renewable sources	1 028 134	1 070 207
[E1.39]	Electricity produced from fossil sources	297 306	303 414
	Electricity sold	914 449	1 159 115

Note 1: The power output reported includes all geographical regions where Navigator has power generation assets, i.e. Portugal and Spain.

Note 2: The figures presented include both power consumed internally at Company facilities and surplus power injected into the national grid.

Note 3: Power generation is quantified on the basis of measurements taken using dedicated meters

[E1.38/40/41] Energy intensity	2025	2024
Consumption of energy in HCIS (MWh)	12 649 217	12 652 651
Net revenues from HCIS (€)	1 969 765 842	2 088 276 553
Energy intensity (MWh/M€)	6 422	6 059

Note: Energy intensity is calculated on the basis of total energy consumption and total revenues, as Navigator's economic activities are classified as being high climate impact sectors (HCIS) [E1.42]

5.2.2.3.3. Gross Scopes 1, 2, 3 and total GHG emissions (E1-6)

[E1.44a] Scope 1 GHG emissions	2025 (tCO_2e)	2024 (tCO_2e)
Scope 1 GHG emissions from fossil sources	531 204	508 250
Scope 1 GHG emissions from biogenic sources	3 313 699	3 551 724

Note 1: The GHG Protocol guidelines have been followed. [E1.AR39b]

Note 2: Scope 1 emissions from fossil sources include emissions under the European Emissions Trading Scheme (EETS), which in 2025 represented 485 054 tCO_2, in other words, 91% of total scope 1 emissions. This figure is provisions, as it has not yet been EETS verified. The 2024 figures was corrected, reflecting the figures determined in the EETS verification [E1.44a/48b/50b]

Note 3: CO_2 emissions from biogenic sources result from combustion of black liquor and other biomass fuels for energy production. They are calculated in accordance with MRR Guidance Document no. 3, of the European Commission, in line with the sustainability criteria of the REDIII Directive.

The calculation of scope 1 emissions includes direct emissions associated with activities carried out by the Company, and excludes the international offices, due to their low materiality. This calculation counts the CO_2 emissions included in the European Emissions Trading Scheme (EETS), which in 2025 represented approximately 91% of the scope 1 total. The other emissions of CO_2, CH_4, N_2O and fluorinated gases are also counted, in accordance with the requirements of the GHG Protocol. We include emissions relating to industrial, forestry and R&D activities, as well as emissions related to Employee travel in our own fleet. CO_2 emissions

from biogenic sources result from combustion of black liquor and other biomass fuels for energy production, in line with the sustainability criteria of the REDIII Directive. Biogenic CO_2 emissions are part of the natural carbon cycle, and are treated as carbon neutral. [E1.AR39b]

In 2025, the most significant changes included the counting of the emissions associated with a full year of operation of Navigator Tissue UK and the impact of operational difficulties experienced at the Setúbal industrial complex, which entailed an increase in fossil fuel consumption, as a result of unplanned stoppages. [E1.47]

The Corporate Inventory of GHG emissions is described in the following table [E1.44d/52/AR47]

[E1.44d/52/AR47] Total GHG emissions (tCO_2e)	**2025**	**2024**	**% Δ**
[E1.44a] Scope 1 GHG emissions	**531 204**	**508 250**	**5%**
EETS emissions	485 054	452 756	7%
Other scope 1 emissions	46 150	55 494	-17%
Emissions from regulated emission trading schemes (%) [E1.44a/48b/50b]	91%	89%	
[E1.44b/49/52] Gross location-based Scope 2 GHG emissions	**81 308**	**140 633**	**-42%**
[E1.44b/49/52] Gross market-based Scope 2 GHG emissions	**142 753**	**126 020**	**13%**
[E1.44c/51] Total Gross indirect (Scope 3) GHG emissions	**1 538 510**	**1 388 985**	**11%**
Category 1: Purchased goods and services	961 651	856 601	12%
Category 3: Fuel and energy-related activities (not included in scopes 1 or 2)	92 501	90 324	2%
Category 4: Upstream transportation and distribution	103 934	95 383	9%
Category 9: Downstream transport and distribution	90 744	96 808	-6%
Category 10: Processing of sold products	112 954	102 467	10%
Category 12: End-of-life treatment of sold products	176 726	147 402	20%
Total location-based GHG Emissions	**2 151 022**	**2 037 868**	**6%**
Total market-based GHG Emissions	**2 212 467**	**2 023 255**	**9%**

Note 1: The GHG Protocol guidelines have been followed. [E1.AR39b/AR46d]

Note 2: Scopes 1, 2 and 3 emissions include emissions associated with all Navigator's activities in all geographical regions, except for emissions associated with the international offices due to their low materiality (<0.02%).

Note 3: Other scope 1 emissions represent emissions associated with industrial assets outside the scope of EETS, emissions associated with fluorinated gases, methane and nitrous oxide and emissions associated with travel in our own fleet. They also include the counting of CO_2 emissions captured in PCC, which, in 2025, ceased to be included under EETS. The include emissions associated with the operations of Navigator Tissue Ejea, Navigator Tissue UK and Portucel Moçambique.

Note 4: The 2024 figures, including EETS emissions, fluorinated gases and Navigator Tissue Ejea emissions, were updated, incorporating the EETS verification prior to publication of the 2023 Sustainability Report, information nor previously available. The materiality of the adjustment is less than 0.3%.

Note 5: Location-based scope 2 emissions were calculated with the latest emissions factors from the International Energy Agency (IEA). Market-based emissions consider the emission factors of the vendors as well as the supply of 100% renewable energy under Power Purchase Agreements (PPA).

Note 6: In scope 3, categories 2, 5, 6 and 7 are excluded, due to their low materiality. Navigator conducted a materiality analysis in 2022, and identified these categories as not material. Categories 8, 11, 13, 14 and 15 are excluded because they do not apply to Navigator's business. In 2025, all emissions associated with the operations of Navigator Tissue UK were included, representing around 7% of total scope 3 emissions. [E1.AR46i]

Note 7: In category 10, emissions relating to processing of pulp into specialty papers were not calculated, due to the lack of an appropriate emissions factor.

In 2025, there was an increase of around 6% in the corporate emissions portfolio in relation to 2024 (location-based), reflecting above all the incorporation a full year of Navigator Tissue UK operations and inclusion of its scope 3 emissions. In relation to the baseline of 2018, EETS emissions were down by 37%. In industrial activities in Portugal, direct emissions per ton of output were up by approximately 7% in relation to 2024. In relation to scope 2 emissions, there was a significant reduction of 42% in relation to 2024 (location-based), due to the reduction in emissions factors. As regards the location-based calculation of emissions, the

emissions factor in Portugal stood at 65.8 kgCO_2/MWh, reflecting the high level of incorporation of renewable energy in the national electrical mix.

With regard to the market-based calculation of emissions, the result is influenced by the supply combinations offered by energy vendors. This indicator takes into consideration the contractual instruments established for supply of renewably sourced electricity, in particular a Power Purchase Agreement (PPA) for 115 GWh with Endesa which includes guarantees of renewable origin, as well as supply of power under physical PPAs associated with the solar power facilities at Figueira da Foz and Ejea. Attention is also drawn to Navigator Tissue UK, where the electricity purchased is all derived from renewable sources.

In order to calculate scope 3 emissions, the guidelines of the GHG Protocol are considered. This involves following a hybrid methodology: average data and spent data. The combination of these two methodologies offers the best approach to calculating scope 3 emissions. [E1.AR46h] The emissions factors selected for calculating scope 3 emissions are taken from credible databases, mostly from Ecoinvent and DEFRA. We do not use emissions factors provided by suppliers [E1.AR39] [E1.AR46g] In 2025, scope 3 emissions rose by 11%, influenced above all by the inclusion of Navigator Tissue UK. Improvements were made over the year to the calculation methodology for these emissions, aligned with Navigator's commitment to progressively incorporation of more comprehensive and better quality data.

With regard to category 1, packaging materials, chemicals and other raw materials not previous quantified were included. The calculation methodology for emissions linked to categories 4 and 9 has also been improved. In upstream transport (category 4), improvements were made to calculation of the distances travelled between Suppliers of chemicals and packaging and our industrial complexes. In downstream transport (category 9), we have included primary transport (between mills and hubs) and secondary transport (between hubs and Clients), as well as improving the calculation of the distances travelled.

[E1.53/54] GHG emissions intensity	**GHG emissions 2025 (tCO_2e)**	**Net Revenues 2025 (€)**	**GHG emissions intensity (tCO_2eq/M€)**
Location-based	2 151 022	1 969 765 842	1 092
Market-based	2 212 467	1 969 765 842	1 123

The following information is incorporated by reference to other parts of the Annual Report:

- More information related to Navigator's net revenues in 2025 (E1.55): no. 2.1 of the Notes to the Financial Statements.

CO_2 stock retained in our products

[MDR-M] Biogenic carbon retained in our products	**2025**	**2024**
Total Mt CO_2	3.8	2.6

5.2.2.3.4. Anticipated financial effects from material physical and transition risks and potential climate-related opportunities (E1-9)

In 2023, Navigator conducted an analysis of financial impacts, in accordance with the TCFD recommendations, quantifying the impact of four risks and one opportunity (see section on SBM-3, at the start of this chapter). Nonetheless, in accordance with the derogation granted by Delegated Regulation (EU) 2025/1416 of the Commission, of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings, Navigator has opted not to disclose the other information in this report.

5.2.3. ESRS E3: Water and marine resources

5.2.3.1. Strategy

5.2.3.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Water withdrawal in area of water scarcity and/or stress (Intensive use of shared resource)	Negative impact	--	Own operations	Water withdrawal
Underground water withdrawal	Negative impact	--	Own operations	Water withdrawal
Surface water withdrawal	Negative impact	--	Own operations	Water withdrawal
Water stress	Risk	Short term - reporting year	Own operations	Water withdrawal
Water consumption	Negative impact	--	Own operations	Water consumption
Water discharges	Negative impact	--	Own operations	Water discharge

NB: the material impacts identified are actual, and so there is no associated time horizon.

5.2.3.2. Management of impacts, risks and opportunities

5.2.3.2.1. Policies related to water and marine resources (E3-1, MDR-P)

The Navigator Company has developed and formalised a series of policies in which the subject of water is addressed, including the **Environmental Policy** and the **Management Systems Policy**. In addition, and specifically in connection with forestry activities, the **Forestry Policy** addresses significant water issues, among other things. These policies are complemented by several other more specific documents such as the General Procedure for Management of Environmental Issues and Technical Standard 08 - Management of Water Resources. [E3.9] The Environmental Board, the Sustainability Forum and the Local Community Monitoring Committees are bodies belonging to the sustainability governance structure that include external Stakeholders (Chap. 3.4.5), and take part in defining Navigator's policies, contributing scientific expertise and the concerns most relevant to local Communities. [ESRS 2.65e]

Navigator’s Environmental Policy addresses issues of water resource use, including water supply, effluent treatment and discharge, and the design of products and services, establishing clear commitments to invest in the best available technologies, continuous optimisation of industrial processes and promotion of water efficiency and ecodesign of products.

As a more general policy supporting the Environmental Management System in accordance with ISO 14001, the Management Systems Policy sets out a commitment to mitigate and minimise environmental impacts associated with Navigator's activities, whilst also promoting adoption of the best available techniques for improving environmental performance, which includes water (and effluent) management. [E3.11 | E3.12c | ESRS 2.65 a]

The **Forestry Policy** does not explicitly address water management, but is part of the sustainable forestry management model, in accordance with the applicable legislation and the FSC (FSC-C010852) and PEFC standards. In order to ensure that water

resources are preserved and used sustainably, a specific water management strategy has been designed, aligned with environmental goals and targets incorporated into forestry management practices. [E3.11 | ESRS 2.65 a] This strategy is designed to prevent impacts on water resources and to boost the positive impacts, ensuring that water quality is maintained and that water remains available. Its priorities are biodiversity conservation and protection of aquatic ecosystems, ensuring the integrity of surface and underground water bodies, as well as preservation of river ecosystems and the environmental services they provide, promoting retention of sediments, hydrological regulation and protection against erosion. [E3.AR18a] [E3.AR18b] Implementation of this approach is ensured by the Forestry Management System, which includes Technical Standard 08 - Management of Water Resources, defining the good practices applied to water management in forestry activities. This set of good practices is applied in the areas of protection, rehabilitation and maintenance. Its scope includes own operations in Portugal and Spain, covering local communities and relevant State authorities. [ESRS 2.65 b]

We recognise that certain regions where we operate face challenges related to **water stress**. In accordance with the WRI Aqueduct Tool the industrial complexes in Aveiro, Figueira da Foz, Setúbal and Ejea (Spain) are located in drainage basins with a level of water stress equal to or higher than 40%. [E3.13] [E3.AR28] The Industrial Complex in Vila Velha de Ródão and the five tissue converting plants in the United Kingdom are located in drainage basins with a level of water stress of less than 20% Navigator has clearly accepted a commitment to contribute to studying and maintaining the ecological requirements of the drainage basins in which it operates, especially in those presenting water stress, acting in close cooperation with the Authorities and local Communities. [E3.11 | ESRS 2.65 a | E3.AR17 | E3.12c]

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Presentation of Environmental Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.2
- Presentation of Management Systems Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.5
- Presentation of Forestry Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.6

5.2.3.2.2. Actions and resources related to water and marine resources (E3-2, MDR-A)

Water is a resource used throughout Navigator's value chain, from forestry production through to the end product. At the different stages of our industrial processes, where the materiality of impact is most significant, water is used in steam production, transport of materials, cooling systems and other areas. The water used is predominantly obtained through surface and underground intakes, and there are only occasional cases where it is obtained from the municipal water network. As a shared resource, it is especially important to use water efficiently, in order to minimise the impact on the water environments in which we operate. Our water intakes are licensed by the National Water Resources Authority, and water is withdrawn in strict compliance with the upper limits authorised. In this context, Navigator has since 2017 implemented the PRWU (Programme for Reducing Water Use) in its operations, the aim of which is a 33% reduction in specific use of water by 2030, in relation to 2019. This programme includes a set of initiatives for optimising processes, such as recovery of water from industrial processes, recirculation of filtered water and closed washing circuits, thereby reducing withdrawal of fresh water. In 2025, 6 initiatives were concluded under the PRWU, representing a potential annual reduction of approximately 1.1 million m^3 of water. [ESRS 2.68 a | ESRS 2.68 e | E3.18]

Alongside this initiative the multidisciplinary PRWU team will continue to identify and implement further measures to optimise water use in the years ahead, with a focus on reusing and streamlining the use of this resource at the stages of pulp bleaching, pulp drying and pulp transfer to the paper machines. [ESRS 2.68 | ESRS 2.69]

In addition to the steps take in an industrial setting, we apply good management practices for water resources in forestry sectors, through measures for protection, rehabilitation and maintenance, ensuring that ecosystems are preserved, as well as the quality of the water in our operations. [E3.18d] Up to 2025, 2 813 hectares were identified as priority areas for protection and sustainable management of water resources in Portugal and 27 hectares in Spain. [ESRS 2.68e]

In Mozambique, the action taken has focussed on assessing water quality in the watersheds, through annual monitoring in the two most significant seasons (rainy season and dry season), and no significant negative impacts have been detected in the micro-watersheds analysed. [ESRS 2.68 a | ESRS 2.68 e]

In 2025, Navigator continued to take part in the Resurgence project, funded by the Horizon Europe programme, demonstrating the Company's commitment to innovation and sustainability in the management of water resources. This project has made it possible to explore advanced methodologies for assessing climate risks relating to water, integrating water shortage scenarios, extreme events and regulatory changes. [E3.AR 20] The project has enabled participants to consolidate methodologies which integrate risk models at micro- and macro-level, whilst also ensuring operational resilience and strategic vision. This approach has added to the need to standardise tools within a dynamic and adaptative framework, so as to promote continuous improvement, inter-sectorial collaboration and fair access to innovation. [ESRS 2.68a]

Main actions: [ESRS 2.68a]	***Status*** [ESRS 2.68a]	**Scope of action** [ESRS 2.68 b]	**Time horizon** [ESRS 2.68 c]	**Results** [ESRS 2.68 to ESRS 2.68e]
WURP Aveiro	Executed	Own operations, in Aveiro	2023-2025	Reduction of water use by 920 000 m³/year
WURP Figueira da Foz	Executed	Own operations, in Figueira da Foz	2023-2025	Reduction of water use by 270 000 m³/year
WURP Setúbal	Executed	Own operations, in Setúbal	2023-2025	Reduction of water use by 1 400 000 m³/year
Direct recycling of effluent from WWTP 2 in Setúbal	Executed	Own operations, in Setúbal	2024-2025	Results achieved: recycling of 250 000 m^3/year
Oxygen delignification, Setúbal	Planned	Own operations, in Setúbal	2026	Potential reduction of 2 m^3/tAD
Definitive installation of effluent reuse from WWTP 2	Planned	Own operations, in Setúbal	2026	Potential reduction of 3 500 000 m^3/year

Note 1: WURP - Water Use Reduce Programme

Note 2: The measures reported were concluded in 2025, and the respective results estimated on the basis of a full year of operation.

Note 3: Measures with CapEx executed in the period 2023 to 2025

Under its Water Use Reduce Programme (WURP), Navigator has implemented some 30 initiatives at its industrial complexes over the past three years, corresponding to CapEx in excess of 3.3 million euros[39]. [ESRS 2.69 a | ESRS 2.69 b] A significant portion of these initiatives arose from process changes without the need for additional investment, thanks to improved knowledge of the operation of industrial equipment, within a framework of continuous improvement and a permanent question for solutions to optimise the use of this resource. At the Setúbal Industrial Complex, a measure was implemented top recover clarified water for use in the pulp presses transferred to PM4, completed in 2024. [ESRS 2.68 a | E3.18 d | E3.18 a] This initiative consisted of partial substitution of the fresh water used in pulp washing with clarified water from the paper production process. In 2025, it was possible to gradually increase the flow of clarified water used in this process until all the fresh water had been substituted. This change has enabled us to improve the reduction in water use in the pulp washing process from 50% to 100%, resulting in an annual reduction in water withdrawal needs of approximately 270 000 m³ in relation to the previous substitution percentage, and of approximately 830 000 m³ in comparison with the scenario of 100% fresh water use in 2022.

Alongside the measures implemented under WURP, the reuse of treated effluent from WWTP 2 in Setúbal presented results in 2025 similar to those for the previous year, and permitted the reuse of approximately 250 thousand m³ of water and the consequent reduction in the volume withdrawn. [ESRS 2.68 e] Despite the significant volume already achieved, this initiative is still at the pilot phase. It is planned to install the project definitively in 2026, which will make it possible to achieve potential

[39] For further information on CapEx - Nos. 3.2, 3.3 of 3.6 the Notes to Navigator's Consolidated Financial Statements.

annual reuse of approximately 3.5 million m³, associated with estimated capital outlay of 960 thousand euros. [ESRS 2.69 a | ESRS 2.69 c]

Oxygen delignification is planned for installation in Setúbal in 2026. This will be implemented in response to the need to improve the quality of the bleached pulp produced at the mill, whilst at the same time reducing water consumption and the organic load in the effluent at the bleaching phase, boosting project efficiency and minimising the environmental impacts associated with production. [ESRS 2.69 a | E3.18 b | E3.18 d] Introduction of the oxygen delignification stage will make it possible to reduce the consumption of chemicals in pulp bleaching, to reduce the organic load of the affluent to the WWTP (and consequently of the final effluent discharged), and also to diminish the colouring of the effluent discharged in the Sado Estuary. Capital outlay is expected to be 25 million euros, with the construction and assembly phase going ahead in 2026. [ESRS 2.69 c]

The following information is incorporated by reference to other parts of the Annual Report:

- Further information on the relationship between the current financial resources allocated to these actions or action plans and the most significant figures in the financial statements (ESRS 2.69b): Nos. 3.2, 3.3, 3.6 of the Notes to the Financial Statements.

Remediation of impacts

We implement various measures to prevent, mitigating and offset the environmental impacts of our operations. As examples, we may cite our collaboration with scientific Institutions and local Authorities in order to reduce the environmental effects of our activities and to minimise the risks for neighbouring Communities. [E3.AR 20] In Aveiro, management and monitoring of salinity levels in Rio Novo do Príncipe, by constructing a temporary water covering structure in the summer months, enables us to ensure the quality of the water needed for industrial operations, and also for farming by local Communities.

At Figueira da Foz, we have operated and maintained the water supply canal which serves the industrial complex, which is an infrastructure belonging to the Lower Mondego hydraulic system. This canal plays a significant role in managing water resources in the region, ensuring both the supply of water for industrial operations, and for irrigation of farmland in the Lower Mondego and other local uses, contributing to the balance of the regional water system. Since 2019, we have invested significantly in maintaining and improving this infrastructure, ensuring that it operates smoothly and provides a continuous service. This work has contributed to responsible management water resources, and to the resilience of the Mondego hydrographic basin.

In Setúbal, we have implemented a plan for management of water withdrawal from the Mitrena peninsula aquifer, in order to monitor and mitigate the impacts of salination of the water body. [ESRS 2.68d]

5.2.3.3. Targets and metrics

5.2.3.3.1. Targets related to water and marine resources (E3-3, MDR-T)

Our commitment to responsible management of water resources considers the quantity withdrawn, but also the quality of the water discharged, as materialised through three targets in our 2030 Roadmap. [ESRS 2.80c] These are aligned with our 2030 Agenda and the Sustainable Development Goals (SDGs), Specifically SDG 6 (Clean Water and Sanitation), SDG 9 (Industry, Innovation and Infrastructure) and SDG 12 (Sustainable Consumption and Production). [ESRS 2.80f]

Goal and target [ESRS 2.80]	***Baseline*** [ESRS 2.80d]	**Associated metric** [ESRS 2.75 ESRS 2.80b]	**Performance 2023** [ESRS 2.80J]	**Performance 2024** [ESRS 2.68J]	**Performance 2025** [ESRS 2.68J]	**Results to achieve** [ESRS 2.80e]
Cut specific use of water by at least 33% by 2030 (Applies to own industrial operations in Portugal)	Benchmark value: 22.4 m^3/t Baseline: 2019	m^3 of water per ton of output	Reduction of 5.1% (21.2 m^3/t)	Reduction of 8.5% (20.5 m^3/t)	Reduction of 8.4% (20.5 m^3/t)	15.1 m^3/t Year: 2030
Reduce by 10% the organic load in Navigator's industrial effluents by 2030, in relation to 2022 (Applies to own industrial operations in Portugal)	Benchmark value: 4.6 kgCQO/t Baseline: 2022	kgCQO/ton of output	Increase of 2% (4,6 kgCQO/t)	Increase of 12% (5,1 kgCQO/t)	Increase of 5% (4,8 kgCQO/t)	4.1 kgCQO/t Year: 2030
Study the potential for reducing water consumption at the Espirra nurseries with a reduction of at least 10%/year in water use up to 2030. (Applies to own forestry operations in Portugal)	Benchmark value: 363,756 m^3/year Baseline: 2022	m^3 water	Reduction of 15% (310 100 m^3/year)	Reduction of 21% (288 279 m^3/year)	Reduced by 18% (297 918 m^3/year)	260 000 m^3/year Year: 2030

The targets of **reducing specific water use** and the **organic load in industrial effluents** are associated with the Management Systems Policy, in mitigating and minimising the environmental impacts of the Company's activities, aligned with the requirements of the Environmental Management System under ISO 14001. These are also associated with the Environmental Policy, in promoting reduction of water use in industrial processes and minimisation of environmental impacts on natural water courses from industrial effluents, implementing, whenever possible, the best available techniques (BATs), in particular in reuse processes and closed circuits, as well as removal and treatment of pollutants. Likewise, the **target relating to study of the potential for cutting water consumption at the Espirra 3 nursery** is related to the Environmental Policy. [ESRS 2.80a | E3.23c]

The targets for **reduction of specific water use** and **of the organic load** in Navigator's **industrial effluents** were established considering the local and global context in which the Company operates, addressing its own industrial operations in Portugal, where the materiality of impact on water is most significant, and are not science-based. [ESRS 2.80c | ESRS 2.80g | ESRS 2.80f] They are related to management of water resources and reduction of water consumption. [E3.23c | E3.23a] Internal Stakeholders were involved in setting them, through the different forums and procedures for dialogue with external Stakeholders, in particular the Environmental Board, the Community Monitoring Committees and the Sustainability Forum, seeking to ensure transparency and alignment with the expectations of the Communities, Authorities and Experts. [ESRS 2.80h]

The target for reduction of specific use of water contributes to reducing water withdrawal, as it seeks to scale down the water intake by optimising industrial processes, reusing internal flows and implementing more efficient technologies. [E3.AR23] It considers all the water withdrawn, including process water, cooling water and water for steam production. [ESRS 2.80c] The methodology established is based on alignment with sector benchmarking, ensuring the strategy of reducing water consumption

uses the best available practices. Historical analysis of the water volumes used at different stages of the process has enabled us to detect critical consumption points and possible optimisations. The benchmark year has been set as 2019, which was representative of normal operation of the mills. [ESRS 2.80f]

The measures that Navigator has implemented with regard to use of water resources are helping the Company achieve the target of a 33% reduction in specific water use. In 2025, in the industrial operations in Portugal, specific water use stood at 20.5 m^3/t, approximately 8.5% lower than in the baseline year (22.4 m^3/t).

In absolute terms, total water withdrawal was approximately 13.4% lower than in 2019, down by approximately 9 hm^3, equivalent to 1.9 months of mill operations in Portugal. [ESRS 2.80j]

The Company operates in regions with water pressure and has implemented measures to **reduce the organic load in its effluents**, such as MBR ultrafiltration at the Setúbal WWTP and oxygen delignification at the pulp mills, ensuring compliance with the Emission Limit Values (ELVs). Established in 2023, these are based on an integrated strategy, considering European guidelines, including the Industrial Emissions Directive. They consider the organic load, measured in kg of chemical oxygen demand in the treated effluents at Navigator's own WWTPs on its industrial complexes. Continuous monitoring ensured progress is assessed and measures adjusted, as necessary. In order to reduce water use, the Company has adopted reuse of internal flows, taking advantage of condensates and optimising industrial processes, so as to minimise withdrawal in areas where water is most scarce. Identification of strategic investment projects, such as installation of ultrafiltration systems at WWTPs and oxygen delignification at pulp mills will enable Navigator to achieve its target, helping to significantly reduce the pollutants discharged. [E3.23 | ESRS 2.80f]

In relation to the target for reducing the organic load in industrial effluents, there was an increase of 5% in relation to the baseline year (4.8 kgCQO/t as compared to 4.6 kgCQO/t), impacted by operational problems at the pulp mills and the Figueira and Setúbal WWTPs. [ESRS 2.80j]

Further information on the emission of liquid pollutants is available in Chapter 8. Our performance, in this report.

The target of **studying the potential for reducing water consumption at nurseries** is being met by a study to assess the potential for cutting water consumption at the Espirra Nursery, with the aim of promoting responsible management of this natural resource in an area identified as under water stress, according to the WRI tool. [E3.23] The strategy is based on full implementation of drip irrigation in the nursery, minimising water losses and cutting consumption, as well on continuous monitoring and control of the irrigation system. [ESRS 2.80f | ESRS 2.80c | ESRS 2.80g] In 2025, there was a reduction of 18% in relation to the baseline year and and increase of 3% in comparison with 2024. These results were influenced by the number of plants produced in nurseries (up on 2024) and the high temperatures recorded in the summer months. [ESRS 2.80j]

We have based water management on a climate risk analysis, aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The focus is on the availability and quality of water in the drainage basins in which we operate, considering the physical risks, such as water stress and drought, and transition risks, including regulatory changes and stricter environmental requirements. Navigator's Enterprise Risk Management (ERM) system includes assessment of these risks and implementation of mitigation measures, with a direct impact on business continuity and resilience. [ESRS 2.80f]

5.2.3.3.2. Total water consumption (E3-4)

Water is used at Navigator predominantly in industrial processes, which account for 96% of all water withdrawn by the Group. In addition, water is used in nurseries and other forestry activities, and is essential for producing plants.

Water is withdrawn for the industrial units mostly through the Group's own intakes, from both surface and underground sources, in accordance with the water resource use licenses granted by the competent authorities. This approach enables Navigator to ensure the water needed for the continuous functioning of production processes is available, maintaining high levels of efficiency and operational control

After being used in industrial processes, approximately 80% of the water withdrawn is returned to the receiving environment in the form of treated effluent, in keeping with the applicable legal requirements and the parameters established in the respective environmental licenses. Used water is treated in the Group's own Water Treatment Treatment Plants (WWTPs), ensuring the quality of the effluent discharged and minimising the impacts on aquatic ecosystems.

The industrial units have small reservoirs of water which function as operational buffers, enabling them to accommodate occasional variations between stages in the production process. However, the quantities of water stored in these infrastructure are not materially relevant in this context.

In our industrial processes, we give priority to using closed circuit water systems whenever technically and operationally viable. One of the pillars of our water efficiency strategy is based on continuously identifying opportunities for closing additional water circuits, making it possible to reduce the intake of fresh water without compromising the efficiency of production processes or the quality of the end product. We promote internal reuse of water withdrawn through recirculation built into the paper production process, in particular in white water circuits, backwaters, reuse of condensates, shower systems and backwashing. These practices contribute significantly to optimising water use and reducing the need to withdraw additional water resources. Since 2024, part of the treated effluent from, WWTP 2 in Setúbal has also been reused and reintroduced in the paper production process. [E3.28e]

			2025	2024
[E3.28a]	**Total water consumption**	**hm^3**	**14.1**	**12.8**
[E3.28b]	in areas of water stress	hm^3	13.8	12.4
		%	98%	97%
[E3.AR32]	**Total water withdrawn**	**hm^3**	**62.2**	**63.0**
	in areas of water stress	hm^3	61.5	62.3
		%	99%	99%
[E3.AR32]	Surface water	hm^3	**36.1**	**35.7**
[E3.AR32]	Groundwater	hm^3	**25.8**	**26.5**
[E3.AR32]	Navy	hm^3	**0.0**	**0.0**
[E3.AR32]	Production	hm^3	**0.0**	**0.0**
[E3.AR32]	Acquired from third parties	hm^3	**0.3**	**0.8**
[E3.AR32]	**Total water discharged**	**hm^3**	**48.1**	**50.2**
[E3.AR32]	Surface water	hm^3	**0.4**	**0.4**
[E3.AR32]	Groundwater	hm^3	**0.0**	**0.0**
[E3.AR32]	Navy	hm^3	**47.6**	**49.7**
[E3.AR32]	Production	hm^3	**0.0**	**0.0**
[E3.AR32]	Treatment by third parties	hm^3	**0.1**	**0.1**

Note 1: Water withdrawal, discharge and consumption data includes all regions, except Navigator Tissue UK, as the respective data was not available at the reporting date.

Note 2: We considered data for industry, forestry and office activities; industrial activities account for 96% of Navigator's total water withdrawal. [E3.AR29 | ESRS 2.77a]

Note 3: Water withdrawal and effluent discharge volumes at industrial units are obtained exclusively through direct metering, using flow meters calibrated in accordance with validated metering standards, representing 100% of the information source. These figures are also reported to the relevant authorities. [E3.28e]

Note 4: In forestry activities in Portugal, volumes of water withdrawal are measured using flow meters installed in each borehole, and an annual analysis is conducted for each borehole. In Mozambique, 99.8% of data is from direct metering, whilst 0.2% corresponds to extrapolations, assuming 2.1 irrigations per plant, with 5 litres of water per irrigation, for a total area of 48 hectares. [E3.28e | ESRS 2.77a]

Note 5: Water volumes acquired from third parties for use in officer are reported on the basis of the amounts invoiced, assuming that 90% of the volume used is discharged in the form of effluent for treatment in municipal WWTPs. [E3.28e | ESRS 2.77a]

Note 6: Water consumption corresponds to the difference between total water withdrawn and the volume of water discharged. [E3.28e | ESRS 2.77a]

Note 7: Areas with high water stress are deemed to be regions where the percentage of total water withdrawn is high (40-80%) or extremely high (over 80%), in accordance with the Aqueduct Water Risk Atlas tool of the World Resources Institute (WRI).

In 2025, the volume of water withdrawal fell by roughly 840 thousand cubic metres in relation 2024, corresponding to approximately 1%, resulting above all from less withdrawal at the Setúbal Industrial Complex. Despite the lengthy stoppages at the pulp mill, which caused procedural instability, in particular in water balances, the measures implemented in late 2024 at the paper mills started to generate visible effects over the course of 2025. These measures contributed to a reduction in the total volume of water withdrawal, as well as in specific consumption per ton of output, pointing to a positive impact from the water efficiency initiatives adopted and adding to Navigator's commitment to optimising the use of this resource in its industrial processes.

	Water intensity (m^3/M€)	Unit	2025	2024
[E3.29]	Total consumption	hm^3	14.1	12.7
[E3.29]	Turnover	M€	1 970	2 088
[E3.29]	**Water intensity (m^3/M€)**	**m^3/M€**	**7 133**	**6 122**

Note 1: The calculation of water intensity considers the total volume of water withdrawn and total consolidated turnover.

5.2.3.3.3. Anticipated financial effects from water and marine resources-related impacts, risks and opportunities (E3-5)

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Description, quantification and time horizons and assumptions relating to the anticipated financial effects relating to the risk of water scarcity (E3.33a, E3.33b, E3.33c) – Chap. 5.2.2.1.1 | Findings of Resilience Analysis and Impact of Climate Scenarios

In accordance with the derogation granted by Delegated Regulation (EU) 2025/1416 of the Commission, of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings, Navigator has opted not to disclose the other information in this report.

5.2.4. ESRS E4: Biodiversity and ecosystems

5.2.4.1. Strategy

5.2.4.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Activities of suppliers of materials and services in the value chain may cause biodiversity loss.	Negative impact	--	Amount	Size of species population
Impact on species with threatened status due to degradation of ecosystems caused by upstream activities.	Negative impact	--	Own operations and upstream	Global risk of species extinction
Exploitation and/or mismanagement of natural resources by Suppliers may lead to an impact on ecosystem services.	Negative impact	--	Amount	Impacts and dependencies of ecosystem services
Advancing habitat preservation and restoration, in conservation interest areas, contributing to the protection and recovery of biodiversity and to resilience in the face of climate change.	Positive impact	--	Own operations	Size of species population
Implementation of programmes and/or projects for restoration, conservation or direct or indirect protection of important ecosystems or habitats with external entities.	Positive impact	--	Own operations	Impacts and dependencies of ecosystem services
Exploitation and/or mismanagement of natural resources by the Company may lead to a negative impact on ecosystem services.	Negative impact	--	Own operations	Impacts and dependencies of ecosystem services
Development of partnerships with academe and/or other entities in conducting scientific studies may contribute to advancing and conserving biodiversity and to restoration methodologies.	Positive impact	--	Own operations	Factors with direct impact on biodiversity loss
Variations in rainfall patterns, high temperatures, extreme weather events, droughts, forest fires, diseases, pests and water availability may have a negative impact on business through biodiversity loss, species distribution and abundance and ecosystem resilience, with consequent reduction of productivity, less access to raw materials and increased operating costs.	Risk	Medium term - From reporting year and up to 5 years	Own operations and upstream	Climate change

Description [ESRS 2.48a]	Impact, Risk or Opportunity [ESRS 2.48a]	Time horizon [ESRS 2.48ciii]	Location in value chain [ESRS 2.48a]	Sub-topic or related sub-topic [ESRS 2.48h]
Contribution to reduction in no./intensity of forest fires through programmes and/or projects, reducing financial losses and positively impacting the social license to operate.	Opportunity	Short term - Reporting year	Own operations	Factors with direct impact on biodiversity loss

Note: The material impacts identified are actual, and so there is no associated time horizon. The double materiality assessment did not point to an material negative impact with regard to degradation, desertification or impermeabilisation of soils. [E4.16b]

Navigator manages approximately **111 thousand hectares of woodlands** in **mainland Portugal**, including **production forests**, and **areas given over to conservation of relevant wildlife** - Conservation Interest Zones (CIZs). All our forests holdings located in mainland Portugal are **certified by the FSC** since 2007, and **under the PEFC system** since 2009. This activity is considered eligible under the European Taxonomy. [E4.16a]

We should stress that **34% of these forest holdings intersect with classified areas**, such as the National Network of Protected Areas (RNAP) and the Natura 2000 Network (RN2000) – Special Conservation Zones and Special Protection Zones –, RAMSAR sites (Wetlands of International Importance) and the UNESCO Biosphere Reserve. It should also be noted that 64.5% of the forest holdings that intersect with sensitive areas is given over to eucalyptus production. [E4.16]

In the holdings under our management, in mainland Portugal, the CIZs are areas that we manage with conservation aims, serving as an important habitat for a diverse range of flora and fauna, including species with different conservation and protection statuses, and endemic species. Within these zones, the High Conservation Value Areas (HCVAs), an exclusive FSC® certification concept, are the most relevant, in view of the presence of environmental, social and cultural heritage elements of exceptional value, which are thereby safeguarded.

In **Galicia (Spain) we manage 1488 hectares of forest** and **39% of these holdings lies within sensitive areas** (mostly in the Biosphere Reserve), and 80.9% of this area is given over to eucalyptus production. [E4.16a]

In Mozambique **we manage approximately 26 932 hectares**, with no operations in sensitive or classified areas. [E4.16]

We have a **Forestry Management Plant (FMP)** for our own and rented holdings with regard to out operations in **mainland Portugal**; this plan complies with the requirements transposed in the technical standards of the Institute of Nature Conservation and Forests, established by ministerial order on the basis of Decree-Law 15/2009. This includes the **Biodiversity Conservation Programmes (BCPs)**, for forestry holdings that overlaps with areas designated for nature conservation or biodiversity, in connection with RN2000 and the RNAP. The aim of these programmes is to ensure that the interventions proposed in the FMP are compatible with and contribute to conservation of protected species and habitats, where their favourable status depends on forestry management. These programmes take into consideration the applicable provisions of the RN2000 Sectorial Plan and other relevant plans and regulations (e.g. management plans or regulations for protected areas and for territorial planning). [E4.16a]

In **Mozambique**, we have a specific **Forestry Management Plan (FMP)**, still without all the information in the FMP for Portugal and without the framework of local standards, given that these do not exist. This guidance document is aligned with forestry certification standards, characterising the physical environment, the socio-economic environment and the Company's actions in areas under management. As well as structuring the management of forestry assets, it provides an integrated overview of the Company's approach, offering an understanding of the overall approach and contributing to improved individual and organisational performance. [E4.16a]

In **Galicia** (Spain), checklists of requirements are drawn up, which are given to Service providers, setting out the constraints needed to prevent or mitigate potential negative impacts from operations, including those which affect biodiversity and ecosystem services. Whenever necessary and applicable, environmental impact studies are carried out and local Stakeholders are consulted, along with the relevant authorities. Each area operation plan is subject to a specific assessment process. [E4.16a]

It is important to note that, although Navigator's operations affect some threatened species, the respective impacts are duly mitigated or avoided. The Sustainable Forestry Management system (Chap. 5.2.6.2.1) includes **detailed matrices for assessing environmental and social impacts**, providing for integrated mitigation measures. [E4.16c]

5.2.4.1.2. Transition plan for biodiversity and ecosystem conservation (E4-1)

Since 2008, our **business strategy has been built into our forestry management model**, and is key factor for **business resilience**. [E4.13a] This strategy is based on assessment of wildlife and the impacts of our operations, on collaboration with Experts and local Communities, on monitoring of biodiversity and ecosystems, and also on gathering information on species and habitats, for mapping and conservation. [E4.13f]

In planning and executing our activities, we seek to **balance productivity, resource conservation and the well-being of Communities**. To this end, we identify natural, landscape, heritage and socio-cultural resources, ensuring they are preserved and improved. **Prior assessment of the environmental and social impacts and the risks** associated with our operations is an essential practise, enabling us to adopt more responsible management. [E4.AR1b | E4.13b]

The evolution of this strategy seeks to respond to the challenges imposed by international initiatives, such as the **EU 2030 Biodiversity Strategy, COP15 and the Kunming-Montreal Agreement**, as well as **the requirements of the Nature Restoration Law** and the **growing scrutiny and assessment of ESG practices**, and to align the governance strategy for biodiversity, aims and endeavours with the regulatory and social requirements, especially in reporting and certification. In order to strengthen biodiversity conservation and to be a Nature Positive company, we have developed **targets for 2030 and 2050** (see section "Targets and metrics" and Chap. 3.4.4), including the statement of positive biodiversity impacts and creation of biodiversity credits, in partnership with Academe. [E4.AR1a | E4.AR1b | E4.11 | E4.AR1d] Alongside this, we have invested in internal training on biodiversity, ecosystem services and restoration, ensuring improved Employee expertise. [E4.11 | E4.AR1d]

Assessment of direct and indirect impacts, risks and dependencies on biodiversity and ecosystem services is a priority. We maintain **certification of responsible forestry management** and regularly review our practises so as to minimise negative impacts, especially in high conservation value areas. [E4.15 | E4.AR1h]

In Mozambique, we continue to invest in raising environmental awareness, in building partnerships that enable us to prioritise ecological concerns in several protection/conservation areas under the Company's management, as is the case of organisations such as the Wildlife Conservation Society (WCS) and Biofund. We also implement an Action Plan for Biodiversity (see section on actions) and a Social Development Programme (Chap. 5.3.3), focused on improving food security, increasing incomes and promoting community welfare, and thereby reducing the pressure on natural resources. In addition, it may be noted that forestry waste from harvesting operations, in larger volumes this year, have in part been used by local Communities, thereby reducing the need to fell native species for firewood/energy.

With this integrated approach, we have stepped up our commitment to biodiversity conservation and sustainable development, contributing to ecological regeneration and improvement of the ecosystems in which we operate. [E4.13]

5.2.4.2. Management of impacts, risks and opportunities

5.2.4.2.1. Policies related to biodiversity and ecosystem conservation (E4-2, MDR-P)

The Company's policies and strategies reflect a wide-ranging commitment to sustainability and a response to biodiversity and ecosystem conservation. The **Environmental Policy** and **Forestry Policies** focus on promoting **responsible management of our plantations and agro-forestry holdings**, with the aim of producing tangible and intangible goods, with respect for conservation of wildlife and socio-cultural assets. Together, through carbon sequestration and storage, in forests and in the resulting raw materials and products, the plantations and agro-forestry holdings we manage contribute to a **circular bioeconomy** and perform an important role in **mitigating the effects of climate change**, in alignment with the **Sustainable Development Goals** - most notably SDGs 15, 2 and 6 (Chap. 5.2.2). Reflecting our commitments, we were among the initial signatories to the **act4nature Portugal initiative**, promoted by BCSD Portugal (see sections on actions and targets). [ESRS 2.65a | E4.AR13]

Our various commitments include the **Environmental Policy**, which deals with promoting sustainable forestry management, and conservation of biodiversity and ecosystem services as an integral part of our forestry management model (Chap. 5.2.6). It also establishes commitments relating to climate change and sequestering CO_2 – an important driver of biodiversity loss - and water management (Chap. 5.2.3), among others commitments. [ESRS 2.65a | E4.23a | E4.AR4]

The **Forestry Policy** stresses our aware of the importance of our assets and adoption of a **forestry management model** that seeks to contribute to maintaining and continuously improving the economic, ecological and social functions of forested areas, both at the level of individual woodlands, and at the forestry landscape scale, embracing a long-term commitment to: The commitments established, directly related to biodiversity and ecosystems conservation, include the following [ESRS 2.65a | E4.23a | E4.AR4 | E4.24a/b/d]:

- To make an active contribution to countering illegal logging and to controlling the origin of the wood purchased.
- To maintain and improve **responsible management of woodlands**, in a balance with their natural and social surroundings, developing and promoting actions, including with third parties, that ensure no **deforestation, degradation and/or conversion of forests**.
- To develop and promote the concept of forest plantations which, thanks to the way they are managed, can make a positive contribution to preserving the **integrity of ecosystems and protecting high conservation values**, avoiding operations in those areas, and assuring **effective processes for Stakeholder participation**, fostering economic growth and job creation
- To implement a forestry management model for which the good practices are documented in a **Forestry Management System**, and informed by expertise obtained through **Research and Development**, as well as including measures to mitigate potential environmental and social impacts.
- To keep conservation of biodiversity and ecosystem services as an integral part of the forestry management model, seeking to ensure that the planning and execution of forestry activities results in, at least, **maintaining the biodiversity values on our holdings ("no net loss")** or implementing initiatives, such as restoration, that lead to a **biodiversity gain ("net positive gain")**,
- To promote **adoption of best practices by Suppliers** and encourage them to operate in keeping with the guiding principles of responsible forestry management, through support, by transferring know-how, monitoring and sharing experiences.

- To maintain a **proactive attitude in relation to other entities in the forestry sector**, such as Landowners, Forestry producers and other Stakeholders, including Suppliers of raw materials, developing strategic partnerships and working actively to improve the overall performance and competitiveness of forests and fostering initiatives for forest certification, as a way of promoting responsible management, and also of **countering the factors that lead to deforestation, forest degradation and/or conversion of natural ecosystems**.

The Mozambique Forestry Policy also addresses our role as an agent of economic and social development, with the aim of establishing forestry plantations and promoting the creation of agro-forestry areas, conciliating the production of goods with conservation of natural resources and responsible action in relation to the families and communities living in our project areas (Chap. 5.2.6). [ESRS 2.65a | E4.24b]

The guidelines stemming from our Environmental and Forestry Policies are set out in key documents of the Forestry Management System, in particular the Company's **Technical Standards**, the **Biodiversity Assessment Techniques Manuals** (BATMs) and the **Conservation Action Plans** (CAPs).

These policies are directly linked to mitigation of impact **factors that contribute to biodiversity loss** and to the **IROs identified in the double materiality analysis**, covering not only the impacts related to biodiversity and ecosystems, but also dependency on ecosystem services, physical risks, traceability of the source of wood from the supplier chain, among other things [E4.23a/b/c/d/e | E4.AR4], translated into the targets and actions presented in the following sections.

With **forest certification** and **support for producers** (Chap. 5.2.6), we manage our forest holdings in mainland Portugal in keeping with the **legal requirements applicable** to the sector and other **regulations and standards to which we have signed up voluntarily**, the pan-European criteria for sustainable forest management, in accordance with Portuguese Standard NP 4406 (Sustainable Forest Management) and the Principles and Criteria of the Forest Stewardship Council®, with which our policies are aligned. Certified forest management allows us to guarantee that the **wood used in our products** - pulp and paper - **is obtained from forests managed on a responsible basis**. [ESRS 2.65d | E4.AR12]

Through our Forestry Policy, we guarantee our commitment that the **production, supply and consumption of raw materials** is in line with principles of sustainability and biodiversity protection (Chap. 5.2.6). We limit purchases of wood and fibre to Suppliers who present proof of responsible practices, avoiding negative impacts on protected areas; we require conformity with the European Timber Regulation (EUTR) and give priority to FSC e PEFC certification, ensuring that natural forests are not converted and traditional rights are not violated. [E4.23d/e]

We invest continuously in **monitoring and assessment, active protection and conservation** (such as rehabilitation or restoration or natural habitats and ecosystems), benefiting species that use them for their ecological functions of feeding, shelter or breeding. These also serve as ecological corridors, enabling species to disperse naturally and permitting genetic interchange between populations. [E4.23e]

We are committed to maintaining and disseminating our Forestry Management System, establishing and updating strategic goals, promoting continuous improvement of its effectiveness and ensuring transparency and alignment with sustainability challenges. [E4.23aiii | E4.AR4]

We have ensured that conservation of biodiversity and ecosystem services is built into our corporate strategy, aligning it with the most up-to-date scientific knowledge and with voluntarily accepted commitments. In order to systematise and assess impacts and dependencies on biodiversity, we are designing a simplified framework, inspired by key elements of the Natural Capital Protocol, in an approach to be tested in a pilot project. [E4.23e]

In addition, we are stepping up training and awareness raising for our Employees, both internal and external, through activities that address biodiversity conservation and implementation of good corporate practices, ensuring more effective engagement, aligned with sustainability principles. [E4.23 | E4.23e]

The following information is incorporated by reference to other parts of the Non-Financial Statement (MDR-P, ESRS 2, §65 a/b/c/d/f):

- Presentation of Environmental Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.2
- Presentation of Forestry Policy (MDR-P, ESRS 2.65 a/b/c/d/f): (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.6
- Presentation of Forestry Policy of Portucel Moçambique (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.6
- Presentation of Social Development Plan in Mozambique (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.3.3

5.2.4.2.2. Actions and resources related to biodiversity and ecosystems (E4-3, MDR-A)

Our approach is centred on biodiversity monitoring, and on promoting biodiversity and ecological restoration, with the aim of maintaining or improving the conservation status of natural and semi-natural habitats, and much of our work in this area is on a long term basis. This action is part of our integrated and sustainable forestry management (Chap. 5.2.6). [E4.28a]

In connection with the **act4nature Portugal** initiative, we have submitted a set of commitments relating to biodiversity and ecosystem services [E4.23e], which we renewed in 2023 (see section "Targets and metrics"), updating and establishing new targets, with the ultimate objective of generating a positive impact, or a net gain, in biodiversity. These targets are centred on implementing **annual monitoring plans for species and habitats,** as well as **work to maintain, improved conservation status and restore biodiversity and ecosystem services (B&ES)** in the forestry holdings under our management. This approach encompasses conservation, rehabilitation and ecological restoration. [E4.23e]

Main actions:	***Status***	**Scope of action**	**Time horizon**	**Results**
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	[ESRS 2.68 to ESRS 2.68e]
Zambujo reCover	Executed and planned	Own operations in Portugal, in Idanha-a-Nova	2022-2050	Conversion of 40 hectares of eucalyptus to holm oak, as well as work to improve conservation status of holm oak habitat in 70 hectares, in habitat 9340 (Forests of *Quercus ilex* and *Quercus rotundifolia.)* Wildlife was monitored in 2025 for the first time after the work was carried out.
Biodiversity monitoring surveys using eDNA (or Environmental DNA).	Executed and planned	Own operations in Portugal, in Arouca and Abrantes	2024-2026	Using eDNA, it was possible to identify the presence of hundreds of different species or genera of organisms at the survey locations, including some granted special protection by the International Union for Conservation of Nature (IUCN). Interpretation of the findings is still ongoing and is due to be completed in the first half of 2026. This project promotes deeper knowledge and wider biodiversity surveys in production forest areas, also providing society with a chance to learn about the ecological role played by these multifunctional areas (see insert "Environmental DNA: data for monitoring and biodiversity protection").
Recovery of the Monchique oak	Executed and planned	Own operations, upstream and downstream in South-west Portugal	2023-2030	Molecular studies employed whole-genome sequencing (WGS) of 80 individuals from nine populations, followed by bioinformatics analysis of populations structure. The findings show a geographical pattern of hybridisation towards the Monchique core areas, with the outlying populations in the Mira and Ribeiras de Aljezur populations presenting high degree of introgression with Portuguese oak. However, it was clear that there were pure individuals, in Monchique and in the Ribeira do Seixe valleys, even when compared with the populations in southern Spain (Algeciras). The most important pockets for in situ conservation had been

Main actions:	*Status*	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	[ESRS 2.68 to ESRS 2.68e]
				recognised, emblematic individuals of great genetic value identified and the ecological conditions and threats have been assessed, paving the way for a plan to build up the population and manage and conserve habitat 9240 in south-west Portugal, including the Monchique SCZ and SPZ and the south-west Alentejo and Costa Vicentina Natural Park. Collection of acorns in turn permitted germination of around 1,558 plants of *Q. canariensis*, *Q. faginea* and Q. *lusitanica*, from 8 distinct provenances, and with germination rates that varied between 20.8% and 87.5%. These were used for restoration work and creation of metacollections in various botanical gardens and arboretums. In addition, the grafting process was successful onto pendunculate oak (*Q. robur subsp. broteroana*) rootstock, and micropropagation processes for *Quercus canariensis and Ilex aquifolium* were concluded. Work is under way on producing a seed and vegetative propagation protocol for these species as a result of these trials.
ForCe Project – Forestry Certification (FC) in Eucalyptus Plantations	Executed and planned	Own operations, upstream and downstream in central Portugal and in Brazil	2022-2026	The findings will be presented subsequent to the publication of this report, as these are projects conducted in partnership.
Sowing plants to attract pollinators to the Espirra Estate	Executed and planned	Own operations in Portugal	2023 - 2026	In a 2023 study, the areas seeded presented a higher number of individuals and nearly twice as many species as the area not seeded, indicating that the sowing of forestry species considerably increased biodiversity at this site. Work continued on seeding the property in 2025.
Inclusion in Network of Bird Sanctuaries	Executed and planned	Own operations, upstream and downstream, in Portugal	2025 - 2026	The first two surveys were conducted (spring and autumn/winter). The remaining findings will be presented subsequent to publication of this report.
Annual plan for monitoring and assessment of impacts prior to each forestry operation.	Executed and planned	Own operations in Iberian Peninsula and in Mozambique	Ongoing action	Experts are hired to help with the monitoring and the findings enable us to make adjustments from time to time in the conservation measures and strategies to be adopted in the following year. In 2025, monitoring (of flora, fauna and vegetation) was carried out by experts on 23 properties throughout mainland Portugal and 4 nesting sites for threatened species were monitored.
Forest restoration pilot programmes	Executed and planned	Own operations in Mozambique	2023 - 2026	Contracting of areas only and exclusively for conservation. Identification of costs associated with restoration. Capacity to engage with the Community on the goal of preservation. Engagement and meetings with potential partners (nursery operators, acquisition of other experiences in the region, etc.).
Partnership with MONTIS - Associação para a Gestão e Conservação da Natureza	Executed and planned	Own operations in Portugal	2025-2027	Support the development and implementation of specific initiatives of common interest in connection with this protocol, in particular in order to improve, protect and restore biodiversity and the soil, on several forestry properties managed by Navigator in the northern area. An "Excursion to Rio Mau and Minas do Braçal" was organised in 2025, and properties were

Main actions: [ESRS 2.68a]	*Status* [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.68 to ESRS 2.68e]
				surveyed with a view to proposals for rehabilitation and reclamation of these areas.
LIFE Serras do Porto	Executed and planned	Upstream, own operations, downstream, in Portugal	2022-2027	Navigator Forest Portugal, SA is a partner of the Parque das Serras project in Porto. In this project, the Company has approximately 55 ha (total area) to carry out ecological restoration work on some of its areas within the Regional Protected Landscape. Work proceeded in 2025 on chemical devitalisation of sumps, and manual planting of cork oak and arbutus (densification). In addition, felled wood material is being placed to form a stockade, and localised undergrowth clearance is being carried out. Along the Silveirinhos brook, work has proceeded on manual felling and debarking/removal of acacias. Wildlife was again monitored in 2025, along with an analysis of the water and of benthic macroinvertebrates, with the aim of assessing the ecological status of the riverside gallery forests.
Multi-criterion spatial analysis, in order to prioritise areas for biodiversity protection	Executed	Own operations in Mozambique	2025	Mapping and prioritisation of conservation/protection areas under Portucel's management; mapping of areas with potential for contracting (exclusively) for conservation purposes; improvement of partnership relationship with WCS (Wildlife Conservation Society).
Alignment of biodiversity strategy with TNFD LEAP approach	Executed and planned	Own operations, in Iberian Peninsula	2025-2026	It is planned to align strategy for all the Group's forestry activities with the LEAP approach by the end of 2026.

The Company allocates each year an internal budget to biodiversity conservation, with a view to attaining the aims of our annual programme for monitoring wildlife, and for developing partnerships on biodiversity conservation, consultancy and training projects. We also have a budget devoted to habitat maintenance and improvement, rehabilitation and restoration. It should be stressed that the recovery of *Quercus canariensis* falls within the scope of "Genetic improvement and forestry reproduction activities - RRP TransForm Agenda Project", for genetic conservation and ecosystem recovery for *Quercus canariensis* (Monchique oak), and is co-funded by this programme. The LIFE Serras do Porto project is also co-funded by Project 101074476 — LIFE21 CCA-PT-LIFE SERRAS DO PORTO. [ESRS 2.69a]

Work currently under way includes: the **ForCe** project will generate new knowledge for science, which will promote conservation of vertebrates, sustainability of eucalyptus plantations, attainment of certification and SDG 8, 12 and 15 objectives; and other projects such as **Zambujo ReCover**, network of bird sanctuaries, the partnership with MONTIS and sowing for insects, which contributes to SDG 15 and, in the case of insects, the 2030 European Biodiversity strategy (decline of pollinators is reversed). [ESRS 2.68a| E4.28c]

The Company's activities take into account the **Habitats and Birds directives**. We assess, identify and map the species and habitats existing and potentially existing in the estates managed. We accordingly adopt measures to conserve species (e.g. when necessary, adjusting the timing of operations to avoid breeding cycles), when present or potentially present on the land. We protect Natura 2000 Network habitats, maintaining or improving their state of conservation, when possible (e.g. restoration), as well as protecting or improving the state of conservation of the habitats of species, such as by creating buffer zones around water courses. [E4.28a | E4.AR20d]

The fundamental principle of **water resource management in forestry operations** (Chap. 5.2.3.2.2) is to **prioritise protection over rehabilitation** (because it is more effective to conserve an existing ecosystem than to artificially reinstate one), thereby reducing the use of more complex and more expensive interventions. Even so, when a given site is in need of rehabilitation, the objective is for it to return as close as possible to its natural state, so that it can achieve its potential. [E4.28a]

In **Mozambique**, the biodiversity conservation approach is based on two dimensions [E4.AR20f | E4.AR20b]:

- A macro dimension, applying across all project areas and with broader aims, such as raising community awareness of environmental issues and promoting conservation farming, as part of the **Social Development Programme** (Chap. 5.3.3); and

- A more micro approach, specific to each conservation/protection block identified.

All the relevant actions, teams responsible, monitoring frequencies and other details are included in an internal document called the **Action Plan for Biodiversity (APB)** [E4.AR20d] This document includes analyses and innovative strategies suited to a forest management model, the mosaic model, which is less common from the perspective of global forests.

We have the **Wildlife Conservation Society (WCS)** as partner, which has worked with us since 2016 on improving and strengthening the effectiveness of our conservation approach, which has been achieved through an variety of projects. [E4.AR20a] In addition, we have been training our focal points in the community - **Community Liaison Officers** (Chap. 5.3.3) –, to use a tool enabling them to survey the fauna and flora in the location/community in which they live or work. This information will be useful for constructing an internal data base which will enable us to have more information, and so make for better decisions on where to focus conservation efforts. [ESRS 2.68a] In late 2025, a project in partnership with WCS was completed for prioritising conservation/protection areas under the management of Portucel Moçambique, on the basis of a multi-criterion analysis. It is envisaged that the public report on this project will be published on this project and WCS website in mid-2026.

We continue to run pilot projects for forest restoration, serving for analysis of the best adapted species, survival rates, maintenance costs, spacing, and other factors. [ESRS 2.68a]

We work to raise awareness of environmental issues, reaching out to the families and the Communities in the areas where we operate. In this work, we seek to build know-how and encourage vigilance as to the impact that practices used by the Community have on natural resources, and we also provide brief practical training activities in more sustainable solutions, using resources available locally. [ESRS 2.68a | E4.AR20b] Likewise, in connection with the Food Security pillar of the Social Development Programme (Chap. 5.3.3), Portucel runs an agricultural extension programme aimed at families, which includes **training in conservation farming techniques**, provision of improved seeds and hands-on training in demonstration fields for agricultural crops. [ESRS 2.68a | E4.AR20b] These initiatives enable us to improve community skills and awareness of good practices, promoting more efficient use of the land, making it more productive, and for longer. In addition, we encourage **beekeeping** as a source of sustainable income, a safeguard for biodiversity and a way of protecting critical forest areas, reducing the need for broadcast burns. Alongside this, our teams support families and communities in **creating safe conditions for burns** - a deeply rooted practice - ensuring this is done in a controlled fashion, taking due account of factors such as temperature, humidity, wind and slopes. We have also been raising the awareness of Community Liaison Officers on matters relating to the recording of local species of fauna and flora; as people who live permanently in the areas operated by Portucel Moçambique, they will have the capacity to help up expand our data base of local species. To help identify the species observed, technical workers and officers interact to establish images/photographs for improved reliability. We have so far mapped more than 342 species, with more than 3113 recorded sightings. [ESRS 2.68d | E4.AR20f | E4.AR20b]

We apply the **mitigation hierarchy in biodiversity and ecosystem conservation wherever we have forestry operations.** In Portugal, these practices are integrated into the forestry management model, ensuring protection of biodiversity on the basis of impact assessments, use of Geographical Information Systems (GIS) and implementation of conservation and ecological restoration plans. The operations are monitored by internal and external audits, ensuring compliance with FSC and PEFC standards. In Mozambique, prevention, minimisation and restoration measures are implemented, in order to reduce the

environmental impact of forestry operations. [E4.28a] These include the mapping of sensitive areas, maintenance of ecological corridors, protection of critical habitats and limitation of interventions during nesting seasons. In addition, steps are taken to minimise the fragmentation of ecosystems, so as to reduce pressure on natural resources and restore degraded areas through reintroduction of native species. [ESRS 2.68a]

We have adopted **sustainable planning which balances production and conservation**, in keeping with the **precautionary principle and mitigation of impacts**. [E4.28a] Environmental assessments include identification of priority conservation areas, where specific measures are applied to maintain and rehabilitate habitats, such as the creation of protection strips around water courses and implementation of buffer zones for threatened species. Strategic partnerships are also promoted with Experts and local Communities in order to strengthen environmental monitoring and implementation of good practices. [E4.AR20a | E4.AR19] As a signatory to the **act4nature Portugal** initiative, Navigator undertakes to **integrate biodiversity into its business models and contribute to protection and recovery of ecosystems by 2030** [E4.28a| E4.AR20e]

Before we start any afforestation or forestry activities and in operations to apply plant protection products, we conduct a comprehensive local assessment, which includes identifying water points, bodies of water, water courses and habitats. Protection strips are established around water courses in order to reduce disruption to the soil, preserve riparian gallery forests, conserve habitats and improve water quality. [ESRS 2.68a | E4.AR19b] To this end, the forestry management practices adopted by the Group divide into two types (**protection/rehabilitation/restoration and maintenance**), both based on the **precautionary principle**. [E4.28a | E4.AR20d]

The following information is incorporated by reference to other parts of the Annual Report:

- Further information on CapEx (ESRS 2.69a): Nos. 3.2, 3.3, 3.6 of the Notes to the Financial Statements.

5.2.4.3. Targets and metrics

5.2.4.3.1. Targets related to biodiversity and ecosystem conservation (E4-4, MDR-T)

In our 2030 Roadmap (Chap. 3.4.4), we have several goals/targets related to biodiversity and ecosystem conservation (indicated in the table). We have also integrated fire prevention and firefighting into our forestry management strategy, recognising the impacts, dependencies, risks and opportunities for biodiversity and ecosystems (Chap. 5.2.6), for which we have set a specific target. [E4.32c] The targets are aligned with targets 2, 4, 10 and 11 of the **Kunming-Montreal Global Biodiversity Framework**, relevant aspects of the **EU Biodiversity Strategy for 2030** and other **national policies and legislation** related to biodiversity and ecosystems. [E4.32b] They also seek to contribute to some of the **SDGs,** such as **15** and **17** (see Chap. 3.4.3). [ESRS 2.80f]

The following information is incorporated by reference to other parts of the Management Report:

- Target "Help reduce rural fires, seeking to ensure that the burned area under Navigator's management stays below 1% each year", which, in the mitigation hierarchy, falls under prevention: [ESRS 2.80] – Chap. 5.2.6.3.1

- Performance achieved in 2025, in relation to commitments made by Navigator through the act4nature Portugal initiative: (ESRS 2.80j) – Chap. 9.3

Goal and target [ESRS 2.80]	**Mitigation hierarchy level** [E4 32f]	***Baseline*** [ESRS 2.80d]	**Associated metric** [ESRS 2.75] [ESRS 2.80b]	**Performance 2023** [ESRS 2.80J]	**Performance 2024** [ESRS 2.80J]	**Performance 2025** [ESRS 2.80J]	**Results to achieve** [ESRS 2.80e]
Create positive impact on (or net gain in) biodiversity by taking action in keeping with commitments made by Navigator through act4nature Portugal.	Prevention, minimisation, recovery and rehabilitation	Benchmark value: Not applicable Baseline: 2020		See Progress Report on Meeting Act4nature Portugal Commitments 2023 (see online)	See chapter 9.3. Progress Report on Meeting Act4nature Portugal Commitments, contained in 2024 Annual Report (see online)	The results are in the table "Actions and resources related to biodiversity and ecosystems" (E4-3, MDR-A); see also chapter 9.3. Progress Report on Meeting Act4nature Portugal Commitments	By 2026: Establish a simplified framework, in line with the key elements of global benchmark frameworks, (e.g. Natural Capital Protocol), for systematic assessment of B&ES impacts and dependencies, testing the approach in a pilot project By 2030: • Execute annual species and habitat monitoring plans and work to maintain, improve the state of conservation and restore B&SE in the forestry holdings managed by the Company, in the following areas: (i) conservation; (ii) rehabilitation; and (iii) ecological restoration • In the field of ecological restoration, start and/or continue work on at least 110 hectares • Continue the other work to maintain and improve state of conservation (work on at least 30 ha/year) • Execute at least one project for recovery of a threatened species and support another • Training programmes with content relating to B&ES conservation topics and raise awareness of good business practices, for internal and external employees.

Goal and target [ESRS 2.80]	**Mitigation hierarchy level** [E4 32f]	***Baseline*** [ESRS 2.80d]	**Associated metric** [ESRS 2.75] [ESRS 2.80b]	**Performance 2023** [ESRS 2.80J]	**Performance 2024** [ESRS 2.80J]	**Performance 2025** [ESRS 2.80J]	**Results to achieve** [ESRS 2.80e]
Consolidate the Biodiversity "By The Navigator Company" project	Minimisation		Benchmark value: Not applicable Baseline: 2022	• Provision of information materials on best forestry practices, genetic materials and contracting forestry land; • 100 posts on Facebook and Instagram; and • 37 content items/articles on website • Partnership with newspaper *Expresso*	• Approximately 24 700 social media followers; • 14 299 new followers • More than 96 000 hits on website; • 156 000 website hits since launch • Approximately 210 online content items.	• 40 120 social media followers: • 19 400 new followers • More than 46 000 hits on website; • 203 000 website hits since launch; • 328 online content items (109 Facebook + 172 Instagram + 47 articles)	Raise the profile of Navigator's biodiversity conservation strategy with urban adults and Portuguese NGOs.

Note: For the first goal, the geographical scope is mainland Portugal; the second include action abroad, although some of the associated initiatives take place in Portugal. [ESRS 2.80c | E4.32d]

The targets established for conservation of biodiversity and ecosystems are related to the policies identified and described above, in the case of creation of positive impact on biodiversity (or net gain), through action based on our commitments.

5.2.4.3.2. Impact metrics related to biodiversity and ecosystem conservation (E4-5, MDR-M)

Owned, rented or managed sites within or in the vicinity of protected areas of key biodiversity zones [E4_35]	2025	2024
Number (sites)	400	383
Area (hectares)	38 743.00	37 901.00

In Mozambique, there are no areas where work has been done in or in the vicinity of protected areas, of key biodiversity zones

In addition, entity-specific metrics are reported. The following data has been audited in the annual audit of compliance with responsible forestry management standards. [ESRS 2.77b]

Name	Performance 2025	Performance 2024
Total hectares, not owned, rented or managed, restored or conserved, in mainland Portugal	112 ha	123.54 ha
% of total owned, managed or rented area set aside for restoration or conservation, in mainland Portugal	11.9%	11.8%
% of total owned, managed or rented area set aside for restoration and conservation, in mainland Portugal[40]	1.9%	1.8%
No. species of fauna and flora, in mainland Portugal [E4.40b]	271 species of fauna 1193 species of flora	268 species of fauna 1195 species of flora
No. red list species identified, in mainland Portugal (GRI 304-4) [41] [E4.40di]	5 are classified as Critically Endangered (CR), 15 as Endangered (EN), 47 as Vulnerable (VU) and 34 Near-threatened (NT)	5 are classified as Critically Endangered (CR), 17 as Endangered (EN), 46 as Vulnerable (VU) and 30 Near-threatened (NT)
Habitats protected or reclaimed (ha)	Protected habitats: 4647 ha Restored habitats 112 ha	Protected habitats: 4474 ha Restored habitats 123 ha

[40] The indicator relates to the fraction of this area in excess of what must obligatorily be carried out under law or commitments voluntarily accepted, such as through forestry certification. In the case of FSC certification, the organisation must manage 10% of its holdings with conservation aims, although it may voluntarily allocate a larger area.

[41] According to the classification of the International Union for Conservation of Nature.

Name	Performance 2025	Performance 2024
Location in or close to protected areas and areas with high biodiversity index [E4.35]	National Network of Protected Areas (RNAP) Hectares: 7660 ha % of total holdings managed: 6.91% Sites classified in the Natura 2000 Network Hectares: 27 209 % of total holdings managed: 24.5% Special Protection Zones (ZPE) in the Natura 2000 Network Hectares: 20 539 ha % of total holdings managed: 18.5%	National Network of Protected Areas (RNAP) Hectares: 7608 ha % of total holdings managed: 7.0% Sites classified in the Natura 2000 Network Hectares: 26 996 % of total holdings managed: 24.8% Special Protection Zones (ZPE) in the Natura 2000 Network Hectares: 20 359 ha % of total holdings managed: 18.7%

Methodological notes [ESRS 2.77a]:

- The 1st metric results from the sum of hectares in the plot where ecological rehabilitation and restoration work is carried out (maintenance and upgrading of habitat conservation status), and the information on execution in the field is confirmed by the Forestry Production and Operations Department in the Forestry Management System (INFLOR).

- In the 2nd, 3rd, 6th and 7th metrics, the percentages and hectares of classified or protected areas are taken from SIG (Geographical Information Systems) data bases, which contain the area effectively managed by the Company, up to 31 December 2025. In particular, the CIZs are catalogued in the SIG data base, in the table of attributes, making it possible to calculate this area in relation to the total area. Forestry management certification requires a minimum of 10% CIZs.

- In the case of the species identified (4th and 5th metrics), species of fauna are mapped in SIG (Geographical Information Systems) by property where they have been identified, by experts, and catalogued in accordance with their threatened status; the same for threatened flora. The calculation is made on the basis of the species existing on the properties under management, up to 31 December 2025. It refers only to native fauna and flora.

5.2.4.3.3. Anticipated financial effects from important biodiversity and ecosystems-related risks and opportunities (E4-6)

The Navigator Group is also assessing the anticipated financial effects from biodiversity and ecosystems-related impacts, risks and opportunities. For this reason, in accordance with the derogation granted by Delegated Regulation (EU) 2025/1416 of the Commission, of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings, Navigator has opted not to report this information. [E4.45a/b/c]

5.2.5. ESRS E5: Use of resources and circular economy

5.2.5.1. Strategy

5.2.5.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Use of raw materials from renewable resources.	Positive impact	--	Own operations	Inflows of resources, including use of resources
Reuse of waste/by-products.	Positive impact	--	Own operations	Waste
Creation of industrial symbioses in materials flow	Positive impact	--	Downstream	Waste
UWF products sold to Clients and Users are designed with a view to a long life or a circular life cycle, helping to ensure that less waste ends up in landfill.	Positive impact	--	Downstream	Outflows of resources related to products and services
Products sold to Customers have high recyclability rates.	Positive impact	--	Downstream	Outflows of resources related to products and services
Building stronger competitive position as a response to the preferences of Clients and End consumers for circular, low carbon products with a high recycling rate.	Opportunity	Medium term - From reporting year and up to 5 years	Downstream	Outflows of resources related to products and services
Implement practices for reuse of materials, in order to reduce costs and dependence on virgin resources, differentiate the company in the marketplace and strengthen its image as a leader in sustainability.	Opportunity	Short term - Reporting year	Own operations	Waste
Difficulty in sourcing raw materials (e.g. chemicals; sands; alternative raw materials) due to disruptions in logistical chains (e.g. geopolitical conflict, strikes, etc.).	Risk	Medium term - From reporting year and up to 5 years	Amount	Inflows of resources, including use of resources
Less wood available for pulp production due to competition for this raw material from other uses (e.g. burning for energy production).	Risk	Medium term - From reporting year and up to 5 years	Amount	Inflows of resources, including use of resources
Loss of production forest due to competition for land use (e.g. installation of solar panels rather than production forests).	Risk	Medium term - From reporting year and up to 5 years	Amount	Inflows of resources, including use of resources

NB: the material impacts identified are actual, and so there is no associated time horizon.

5.2.5.2. Management of impacts, risks and opportunities

5.2.5.2.1. Policies related to resource use and circular economy (E5-1, MDR-P)

We have several policies which structure our approach to the use of resources and the circular economy, and which ensure a responsible development model, promoting substitution of virgin raw materials with renewable materials and sustainable sources of supply [E5.15.15] The most important of these are the **Environmental Policy** and the **Management Systems Policy**. These policies are complemented by procedures for managing environmental issues (PG80) and waste management (PG27). [E5.14] In order to ensure compliance with best environmental practices, the Company has adopted recognised standards, including ISO 14001, and conforms to the legal requirements applicable at national and European level. Attention is also drawn to ISO 9706, which guarantees that paper does not lose its properties over 100 years (on display) or 200 years (in dark storage). In addition, the Company is licensed to use the European Union Ecolabel for tissue papers and printing papers. [ESRS 2.65d]

The policies referred to above establish Navigator's general commitments in relation to environmental matters, establishing guidelines for sustainable operations. In connection with the circular economy, the Company is committed to: (1) promoting the circular bioeconomy, reusing waste and by-products from processes within a logic of industrial symbiosis and incorporating them in new applications and products; (2) using ecodesign both in products and in packaging, selecting more sustainable materials and ensuring they are recyclable and, whenever possible, biodegradable; (3) actively encouraging Consumers to recycle its products, through dedicated messaging and campaigns. This set of policies also underlines the need to: demonstrate the sustainable origin of wood, giving priority to certified sources and promoting use of renewable materials, as well as product recyclability; develop and apply solutions which make for more efficiency in using wood in the industrial process; whenever technically and economically viable, replace hazardous chemicals with non-hazardous products, in keeping with best available techniques. [ESRS 2.65a]

By means of our corporate policies, we have committed ourselves to mitigating and minimising the environmental impacts of our operations, working to reuse waste in closed-loop systems and to adopt best available techniques for improving environmental performance. We also encourage our Suppliers to develop products aligned with our environmental requirements, highlighting the incorporation of renewable materials as a strategic indicator. In addition, we promote compliance with FSC and PEFC standards, strengthening the commitment to sustainable forestry. PG80 - Management of Environmental Issues, a complementary document to this policy, also guides the Company towards preferential use of renewable resources, rather than non-renewable resources. [E5.15]

The Environmental Policy, the Systems Management Policy and PG80 - Management of Environmental Issues (referred to below as PG80) adopt an integrated approach, applying, whenever possible and appropriate, the strictest level in the **waste hierarchy**, namely **prevention**. The Company works to develop and implement processes and technologies that maximise efficiency, minimise losses and encourage recirculation of resources, helping to reduce waste production. This policy includes measures for prevention, recycling and reuse. PG27 - Waste Management Procedure (referred to below as PG27)lays down guidelines for the correct sorting and classification of waste, ensuing that the final disposal is the most appropriate and causes the least possible impact on health and the environment. The approach adopted follows a hierarchy that assigns top priority to prevention, followed by (preparation for) reuse, recycling, other types of reclamation and, in the final instance, disposal. This approach accordingly helps to extend the life cycle of materials, paving the way for synergies between Navigator and its partners, within the logic of the circular economy. These documents prioritise waste prevention and reduction over treatment (including recycling), adopting the fundamental principle of reducing waste generation at source, efficient use of raw materials, minimisation of waste and optimisation of production processes. [E5.AR9a/b]

Document	Management Systems Policy
Key content and goals [ESRS 2.65a]	This Policy sets out Navigator's general commitments in relation to its quality environmental, energy and safety management systems.
Scope [ESRS 2.65b]	It applies to own operations, and is aimed at internal and external Stakeholders (e.g. Suppliers, Industrial Synergies), and covers Portugal, Spain and Mozambique.
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• FSC and PEFC standards, certifying the origin of fibrous materials • ISO Standards 9001, 14001, 50001
Most relevant complementary documentation	General procedure: Management of Environmental Issues (PG80) General procedure: Waste Management (PG27)
Availability [ESRS 2.65f]	This document is communicated to all Employees, Business partners and Stakeholders through the intranet and online, and is displayed at workplaces.
References over the course of the Non-Financial Statement	• E1 – Climate change (Chap. 5.2.2) • E3 – Water and marine resources (Chap. 5.2.3) • S1 – Own workforce (Chap. 5.3.1) • S2 – Workers in the value chain (Chap. 5.3.2)

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Presentation of Environmental Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.2

5.2.5.2.2. Actions and resources related to resource use and circular economy (E5-2, MDR-A)

Navigator has embraced responsible management of natural resources, attaching priority to raw materials from sustainable and certified sources. All the wood used is from FSC/PEFC certified and/controlled sources, guaranteeing responsible forestry practices aligned with the principles of the circular economy.

In line with this, the Company assigns priority to Portuguese Suppliers, both for wood and other raw materials - including chemicals, additives or packaging materials. This helps to shorten the value chain and reduce the environmental footprint associated with transport. in addition, it promotes strategic partnerships with suppliers to select more sustainable raw materials, boosting efficiency in the use of resources and contributing to an environmentally responsible business model.

Internally, Navigator has adopted ongoing measures to achieve operational efficiency, from a perspective of cost cutting and optimising resource use, by implementing more advanced technologies.

In conjunction with its forestry and paper research institute, RAIZ, and in partnership with external bodies, the Companies combines sustainable use of resources with innovation, developing solutions that promote circularity and reuse by-products.

These initiatives reflect a systematic approach to maximising efficiency and minimising environmental impacts. [ESRS 2.68]

The Navigator Company's strategy for responsible use of resources includes the following areas of action: [ESRS 2.68e]

1) **Development of bioproducts from forest raw materials**, contributing to a more sustainable and innovative business.

2) **Efforts to source Portuguese raw materials**, thereby shortening value chains. In 2025, approximately 73% of wood used was sourced from Portugal, contributing to domestic value added. In addition, 70% of other subsidiary raw materials were acquired from Portuguese suppliers.

3) **Implementation of ongoing efficiency measures.** In 2025, new technologies were introduced, such as *Advanced Process Control* (APC), which has made for significant efficiency gains, in particular in the bleaching process at the Aveiro pulp mill and in the use of PCC in paper machine 1 in Figueira da Foz.

4) **Optimisation of packaging**, with steps to reduce or substitute virgin and fossil-based materials with recycled and renewable materials. Prime examples of this include the substitution of 100% virgin wood pallet decking with MDF decking, substitution of 100% virgin wood pallet blocks with black ins recycled wood fibre, and incorporation of recycled materials in packaging for tissue products.

5) **Building up partnerships with academic institutions, research centres and companies**, in order to create innovative solutions for reclaiming industrial by-products. Navigator has worked on demonstration projects which promote the use of waste in developing new products, permitting the partial or total substitution of virgin raw materials and working to have waste reclassified as by-products.

6) **Cutting waste production** – in 2025, the total quantity of waste generated represented only 9% of material inflows. If we include fuels in the raw materials used, waste generated represented 8%.

7) **Minimising production of hazardous waste** which, in 2025, represented only 0.2% of total waste generated.

8) **Implementation of best practices in waste management** in Navigator's internal processes, in collaboration with WMOs and other industrial partners. Examples of these practices included minimising dust when unloading ash, by humidifying them, use of tanker trucks (instead of open trucks), to reduce dust dispersion during transport and raising the awareness of hauliers to the correct stowage of loads.

Main actions: [ESRS 2.68a]	**Status** [ESRS 2.68a]	**Scope of action** [ESRS 2.68 b]	**Time horizon** [ESRS 2.68 c]	**Results** [ESRS 2.68 to ESRS 2.68e]
Reclamation of carbonate sludges	Executed and planned	Own operations, External partners, in Portugal	Ongoing action	52.6 thousand tons reclaimed in 2025
Reclamation of biological sludges	Executed and planned	Own operations, External partners, in Portugal	Ongoing action	61.9 thousand tons reclaimed in 2025
Reclamation of sand	Executed and planned	Own operations, External partners, in Portugal	Ongoing action	34.7 thousand tons reclaimed in 2025
Installation of Lime Kiln, Figueira da Foz	Executed	Own operations, External partners, in Portugal	Completed	Potential 90% reduction in production of carbonate sludge Trial phase initiated in 2025

Main actions: [ESRS 2.68a]	Status [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.68 to ESRS 2.68e]
Alteration of fly ash discharge system to dry method, Setúbal	Executed	Own operations, External partners, in Portugal	Completed	Dry fly-ash discharge will make it possible to identity new applications for reclaiming this waste product
Use of APC (Advance Process Control) to cut consumption of chemicals, Aveiro	Executed	Own operations, in Portugal	Completed	5% reduction in annual consumption of chemicals in bleaching at the Pulp mill Start-up in 2025
Reuse of BPP ash. Aveiro	Planned	Own operations, External partners, in Portugal	Start-up 2026	Potential reclamation of 15 000 tons of fly ash over 5 years Trial phase initiated in 2025
New facility for incorporating biological sludges in evaporation, Aveiro.	Planned	Own operations, in Portugal	Start-up 2026	Trial phase initiated in 2025
Oxygen delignification, Setúbal	Planned	Own operations, in Portugal	Start-up 2026	Reduction in annual consumption of chlorine dioxide in bleaching at the Pulp mill

Note: No negative material impacts and only positive impacts have been identified associated with the use of resources and the circular economy, meaning that no remediation actions are identified [ESRS 2.68d].

In connection with the circular economy and efficient use of resources, Navigator continues to implement a structured approach geared to optimising production processes, reuse of waste and by-products and cutting consumption of virgin raw materials. These initiatives help to mitigate the risks associated with the availability of resources, to boost operational efficiency and promote a forest-based bioeconomy.

Industrial optimisation and reduction of losses

Optimisation of production processes is a strategic priority, focused on minimising losses of fibre, reducing consumption of chemicals and efficient use of water. Installation of Advanced Process Control (APC) systems at the Aveiro pulp mill have made it possible to achieve a 5% reduction in annual consumption of chemicals in bleaching, to reduce process variability by 28% and improve the quality of the end product, entailing capital outlay of approximately 240 thousand euros. On paper machine 1 in Figueira da Foz, application of APC, still at the trial phase, has enabled a 1% increase in PCC incorporation and a 15% reduction in variability, helping to cut specific consumption of fibre.

The installation of a oxygen delignification system at the Setúbal pulp mill, planned for 2026, will make it possible to cut consumption of chemicals in the bleaching phase, boosting process efficiency and reducing the associated environmental footprint. The project, which moved into the execution phase in 2025, represent total capital expenditure of approximately 25 million euros.

Industrial symbiosis and external reclamation

The project for the new biomass-fuelled lime kiln for the pulp mill in Figueira da Foz, within the framework of the Decarbonisation Roadmap, will make it possible to reduce generation of **carbonate sludges**. At present, capacity limitations in the chemical recovery process mean these sludges are purged daily, and then constitute waste. This material is however reused in collaboration with external +partners, and incorporated in production of cement products. Complementing this, the NEW YIELD product has assessed incorporation of carbonate sludges as filler in production of UWF paper, and industrial trials have been conducted with the aim of partially substituting precipitated calcium carbonate. This solution helps avoid landfill disposal: and promotes circular use of materials.

Biological sludges from effluent treatment are also reclaimed by being sent for composting or used as a fuel in the production of expanded clay, also in close collaboration with external partners.

In addition, **fluidised bed sands** from the biomass boilers are reused in producing construction materials, benefiting from their classification as a by-product and contributing to more efficient use of resources.

Reclamation of ash and structural CapEx projects
The partnership established with Saint-Gobain for reclamation of the ash from the Aveiro Biomass Power Plant (BPP) in production of mortars made significant progress in 2025, with capital outlay of approximately 560 thousand euros related to this project. Despite a number of operational constraints in the BPP, it was possible to start the first trials with this material in the course of the year, and additional developments are planned together with consolidation of this solution during 2026.

Waste management in forestry operations
In forestry operations, including nurseries, waste is selectively collected, correctly stowed and sent for appropriate disposal, prioritising reuse operations and promoting practices aligned with the waste hierarchy. We also work actively to prevent illegal fly-tipping of waste in woodlands.

Overall, these initiatives reflect Navigator's commitment to efficient use of resources, reduction of landfill disposal: and consolidation of a circular economy model integrated into its industrial strategy.

The following information is incorporated by reference to other parts of the Annual Report:

- The relationship between the current financial resources allocated to these actions or action plans and the most significant figures in the financial statements can be consulted in the chapter on the financial statements (ESRS 2.69b) – Nos. 3.2, 3.3, 3.6 of the Notes to the Financial Statements.

5.2.5.3. Targets and metrics

5.2.5.3.1. Targets related to resource use and circular economy (E5-3, MDR-T, MDR-M)

Our **2030 Roadmap** (Chap. 3.4.4) has established **two targets** focussing on **waste**. The target for **reducing disposal of waste in industrial landfill** is aligned with national and European goals for sustainable waste management. It contributes to SDG 12 (Sustainable Consumption and Production), promoting reuse of materials, and is in keeping with the national targets established for waste management and with European Directive 2018/850, which imposes tougher restrictions and encourages recycling and reuse for energy purposes. In addition, it is compliant with the **waste hierarchy principle**, prioritising reduction and reuse over final disposal and supports the General Waste Management Rules (GWMR) by fostering the circular economy, reducing the environmental footprint of industry and incentivising technologies for reusing waste. [ESRS 2.80f] The target relating to development of **sustainable, value-added applications, for by-products from the industrial process** falls under other types of reclamation, in the waste hierarchy. [E5.25]

Goal and target [ESRS 2.80]	***Baseline*** [ESRS 2.80d]	**Associated metric** [ESRS 2.75 ESRS 2.80b]	**Performance 2023** [ESRS 2.80J]	**Performance 2024** [ESRS 2.68J] [ESRS 2.80J]	**Performance 2025** [ESRS 2.68J]	**Results to achieve** [ESRS 2.80e]
Achieve by 2030 a rate of waste disposal in industrial landfill of less than 10%.	14% in 2021	Waste deposited in landfill (t)/Waste generated (t)	12%	12%	16%	<10% in 2030
Develop sustainable applications and added value for by-products from industrial process (sludges, ash and other inorganic waste)	N/A	N/A	4 800 t of carbonate sludges reclaimed in production of PCC 35 624 t of sands (by-product) reclaimed for construction sector	13 55 t of fly-ash reclaimed in concrete articles 1 260 t of carbonate sludges reclaimed in production of PCC 39 995 t of sand (by-product) reclaimed for construction sector	10 746 t of fly-ash reclaimed in concrete articles 764 t of carbonate sludges reclaimed in production of PCC 32 324 t of sand (by-product) reclaimed for construction sector	N/A

Both targets are in relation to Navigator's own operations in Portugal. They are not science-based, nor were ecological threshold values considered. These targets are not a legal obligation, but are adopted voluntarily as a result of engagement with internal Stakeholders, the Environmental Board and the Community Monitoring Committees. The targets set are aligned with the Environmental Policy and the Management Systems Policy, and the respective complementary documents. [E5.25 | ESRS 2.80a | ESRS 2.80g | E5.26 | E5.27]

The methodology for setting the first target was based on the following points [ESRS 2.80f]:

- Alignment with the goal of reducing the amount of waste dumped in landfill, indexed to sector benchmark.
- Historical analysis of waste and by-product flows.
- Identification of waste reclamation opportunities - For the main secondary flows, potential reclamation solutions were analysed, maximising reincorporation into production processes.
- Declassification from waste to by-product - This approach permits alternatives to conventional reclamation with WMOs, extending the possibilities for reuse.
- Planning and scheduling - The company has established a multiannual plan for implementing the measures, so that the target is met gradually.
- Monitoring and readjustment

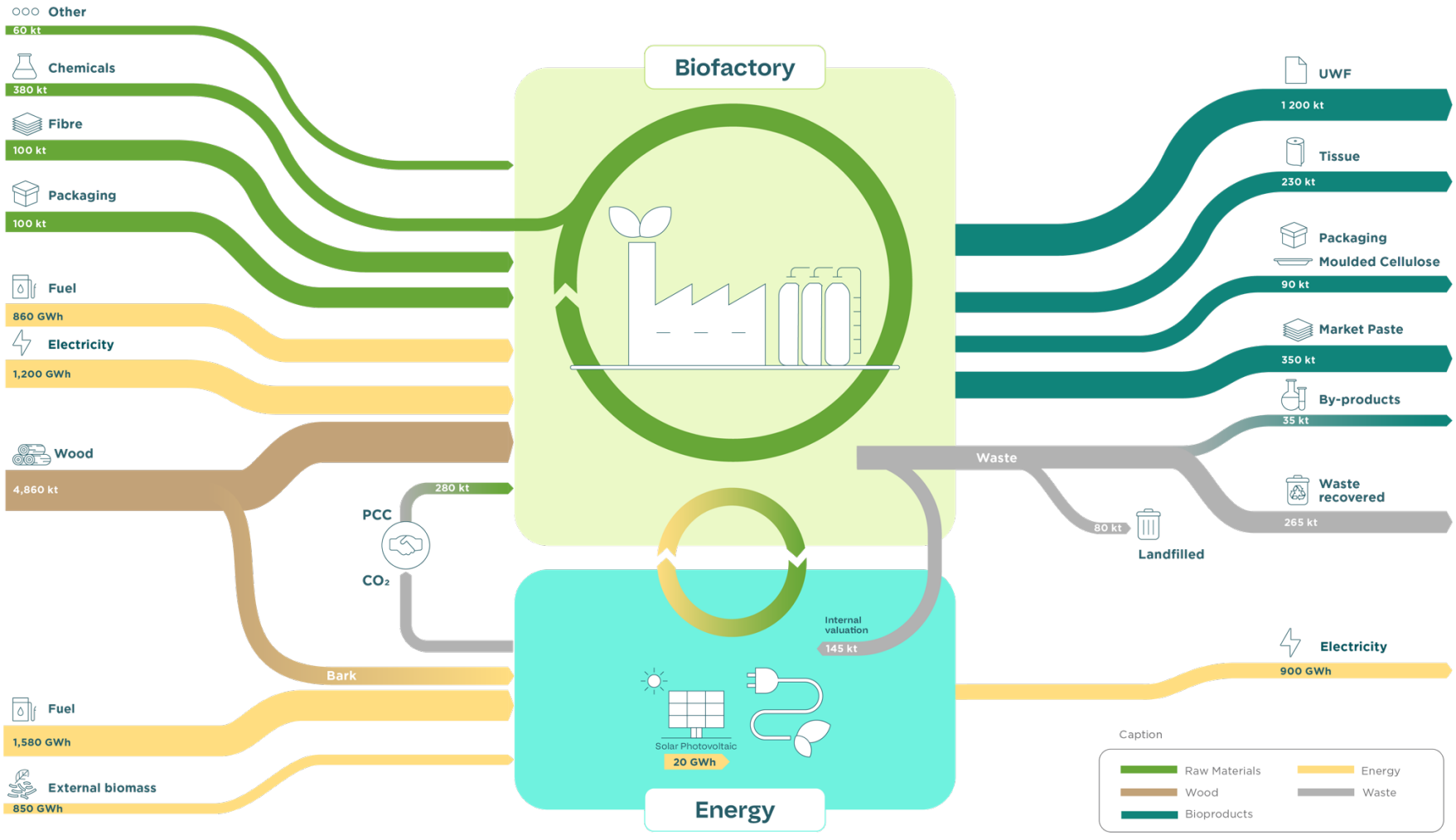
In relation to the first target, in 2025, the landfill deposit rate increased to 16%, reflecting one-off operational constraints and temporary limitations on reclamation of certain waste flows. Nonetheless, we remain committed to the target set for 2030. Further details can be found in the following section.

With regard to the second target, Navigator seeks to maximise circularity in its production processes, working continuously with RAIZ, and technological and industrial partners to assess sustainable applications for by-products from the industrial process. Waste and by-products reclaimed in value-added applications are quantified using the same methodology applied to all waste generated. [ESRS 2.80f] In 2025, performance improved in relation to previous years, with a 3% increase in materials reclaimed in comparison with 2024. [ESRS 2.80j]

5.2.5.3.2. Resource inflows (E5-4)

The Navigator Company constantly monitors inflows of resources into its production processes, including wood, chemicals, packaging materials and others, optimising their use with a view to operational efficiency and sustainability. The central focus is on cutting specific consumption and adding value to raw materials, by promoting circular and responsible practices throughout the production chain.

Material Balance 2025



Operations	Resource inflows
[E5.30]	[E5.30]
Products (including packaging)	In its industrial processes for eucalyptus kraft pulp, UWF paper, packaging, tissue and energy, Navigator adopts a sustainable and efficient industrial model in the use of resources. The production chain involves incorporating essential raw materials, auxiliary products and packaging used throughout the process and in final distribution, as well as a range of technological equipment. Packaging materials include materials from renewable sources, such as cardboard boxes, wrapping paper, wooden pallets and labels, but also other materials, such as stretch or cling film, plastic belts and wire for bundling.
Materials	Essential raw materials used in Navigator's industrial processes include *Eucalyptus globulus* wood from sustainably managed forests, both from its own plantations and acquired from third parties. Of the total wood consumed, 84% is from FSC and PEFC certified plantations. For pulp production, we should mention chemicals such as sodium hydroxide, sodium chlorate, sulphuric acid, oxygen and hydrogen peroxide. Production of UWF paper uses precipitated calcium carbonate (PCC), starch, gluing agents and optical whitening agents. In tissue production, we use wet strength agents. In addition, Navigator used purchased fibre, complementing the eucalyptus fibre produced internally with long fibre pulp, recycled fibre and unbleached fibre. In terms of fuel, the Company uses black liquor and eucalyptus bark from wood used in pulp production, as well as waste forestry biomass for generating energy. It also uses some fossil fuels, including natural gas, fuel oil, diesel and propane.
Water and assets	Water is a fundamental resource, and is used for the cooking, bleaching and paper sheet formation stages. Approximately 80% of the water used is duly treated and returned to the environment, ensuring the sustainability of the production process.

		2025	2024
Total Inflow of Resources [E5.31a]	**t**	**5 877 755**	**5 241 400**
Biological Materials [E5.31a]	t	5 104 575	4 503 929
Madeira	t	4 856 060	4 359 966
Fibre	t	100 972	81 400
Tissue	t	83 075	0
Starch	t	64 417	62 563
Others	t	51	0
Technical Materials [E5.31a]	t	773 180	737 472
Chemicals	t	654 390	640 191
Packaging	t	100 944	96 271
Others	t	17 845	1 010
Sustainably sourced biological materials [E5.31b]	%	99%	99%
Secondary Materials [E5.31c]	%	0%	0%
Secondary Materials [E5.31c]	t	2 531	0

Note 1: Data for material inflows include all geographical regions where Navigator operates. [E5.32]

Note 2: We considered data for industry, forestry and office activities; industrial activities account for 99% of Navigator's total material inflows. [E5.32]

Note 3: Resource inflow data is determined on the basis of measurements made at the factory gate, in particular using duly calibrated weighbridges for quantifying wood, chemicals, fibre, fuel, packaging and other materials. In the case of materials counted in units, such as certain packaging materials, the respective unit weights were used for conversion into tons. [E5.32]

Note 4: In 2025, the resource inflow table was adjusted, and now classifies materials in as biological, technical and secondary, in line with the requirements of ESRS E5 standard. The main methodological changes include the inclusion of the weight of bark in the wood consumed and the raw materials acquired by Navigator Tissue UK. [E5.32]

Note 5: Sustainably sourced biological materials include wood, fibre and tissue acquired with FSC and/or PEFC certification, or which meets the criteria for controlled wood and the applicable due diligence requirements. [E5.32]

Note 6: Secondary materials correspond to the quantity of material recycled or incorporated in products and/or packaging. [E5.32]

5.2.5.3.3. Resource outflows (E5-5)

Products and materials

Navigator products incorporate the principles of the circular economy and are developed with a focus on recyclability, efficient use of resources and recirculation in the biological cycle.

BEKP (Bleached Eucalyptus Kraft Pulp) is a renewable and biodegradable material, which can be used in producing new paper or recycled fibres. Obtained from FSC and PEFC certified plantations, sustainable sourcing is guaranteed. [E5.35]

High yield unbleached eucalyptus pulps, in particular **UEKP** (Unbleached Eucalyptus Kraft Pulp) and **HYKEP** (High Yield Eucalyptus Pulp), have been developed to for applications in the packaging sector, helping to substitute fossil-based plastics. Reduced use of chemicals in the bleaching process has enabled a reduction in the respective carbon footprint, without compromising performance and the quality demanded for the intended applications.

UWF (Uncoated Woodfree) **Paper** is outstandingly durable, maintaining its quality over multiple recyclings. Being 100% recyclable and uncoated, it can be fully reincorporated in the production process as secondary fibre, ensuring it is recirculated in the product life cycle. [E5.36c]

The paper produced by Navigator present high opacity and strength, meaning they can be reused prior to recycling and promoting more efficient use of resources. The production process minimises the use of harmful chemicals, contributing to the biodegradability of products which are not recycled. [E5.35]

In addition, the UWF produced by Navigator meets the requirements of ISO 9706:1994, ensuring a useful life in archive use of more than 200 years. [E5.36a | 5.36b]

Tissue paper is developed for efficient use, reducing waste per sheet through compaction technology. Some products include recycled fibre, promoting the recirculation of materials. In addition, they are biodegradable, permitting sustainable integration into the biological cycle with low environmental impacts. [E5.35]

Packaging products, developed under our gKraft™ brand, are also produced on the basis of *Eucalyptus globulus* fibres. This portfolio includes products made from unbleached pulps, such as UEKP and HYKEP, which use a smaller quantity of chemicals in the production process. The packaging segment includes **moulded cellulose** products, such as trays, dishes, plates and food packaging used for food or ready meals. These renewably sourced products, produced in accordance with BfR standard XXXVI, make it possible to substitute packaging made from fossil-based plastic. [E5.35]

In addition to products sold, by-products are generated at the industrial units which can be incorporated into other materials. BPP **fly ash**, classified as a by-product in January 2025, can be incorporated in specific mortars, partially or totally replacing mineral binder. **Sands for biomass boilers**, classified as a by-product in October 2019, can be used in manufacturing cement, cement mortars and paving, as fine aggregates.

All products produced by Navigator are from **biological and biodegradable sources**. The volumes of products and by-products produced by Navigator are all calculated on the basis of direct measurement. [E5.40]

Waste

Total waste generated (t) [E5.37a/5.37b/5.37c/5.39]	Hazardous		Non-hazardous		Total waste	
	2025	2024	**2025**	2024	**2025**	2024
TOTAL	**1 150**	**979**	**491 647**	**445 622**	**492 797**	**446 601**
Reclaimed	**742**	**620**	**266 964**	**300 307**	**267 707**	**300 927**
Preparation for reuse	50	93	0	0	50	93
Recycling	192	137	115 664	184 852	115 855	184 988
Other forms of reuse	501	391	151 301	115 456	151 801	115 847
Disposal	**408**	**359**	**224 683**	**145 315**	**225 091**	**145 674**
Incineration, providing energy	0	0	114 077	88 759	144 077	88 759
Landfill	283	113	80 155	56 335	80 438	56 448
Others	125	246	452	221	576	467

Note 1: The data relating to waste includes all geographical regions where Navigator operates, except Mozambique, due to its low materiality.

Note 2: Data from industrial and forestry operations was taken into consideration; waste generated in industrial activities in Portugal and Spain accounts for 99.9% of total.

Note 3: The calculation methodology is based on direct measurements effected using the duly calibrated weighbridges at the industrial complexes. All the waste sent to waste management operators (WMOs) is accompanied by the respective e-GAR and registered on the SILIAMB platform. [E5.40]

Note 4: In 2025, the main methodological changes were the inclusion of waste generated by Navigator Tissue UK and review of the methodology for calculating sludges from the Aveiro WWTP, which now distinguishes between primary sludges and biological sludges.

The **waste** generated in Navigator's activities is **mostly non-hazardous**, and in 2025 this accounted for 99.8% of total waste generated. The production of certain waste flows increased in 2025 in relation to 2024, essentially due to specific operational circumstances and work undertaken to improve industrial processes. In Figueira da Foz, the reduction in outflow of carbonate sludges for external reclamation entailed temporary disposal of this material, in compliance with the storage limits established in the landfill operation license. The lengthy stoppages in the lime kilns at the pulp mills, due to both operational constraints and to the start-up of new biomass burners gave rise to occasional increases in the production of dregs and grits, and also of carbonate sludges. In addition, the increased production of sludges from the Aveiro WW was the result of careful management of the age of biological sludges in secondary treatment, whilst the paper waste sent to recyclers reflected the reclamation of materials rejected from warehouses. [E5.38]

In **industrial activities**, the waste flows with the largest volume are WWTP sludges generated in treating effluents, fly-ash from biomass boilers and carbonate sludges from the causticising process at pulp mills. The waste management hierarchy principle is used, applying the highest level whenever possible, as laid down in the Company's policies and procedures. [E5.38]

In **forestry operations**, the most significant waste flows correspond to packaging, packaging waste and used tyres. The tyres are mostly the result of illegal fly-tipping by third parties in areas under the Company's management. The materials present in these flows include plastics, chemical wastes with hazardous and non-hazardous properties, and wood. There was an increase in 2025 in the waste quantified in forestry operations, as the result of a general clearance operation at the Ferreira Nursery, which made it possible to send waste accumulated over several years, consisting mostly of plastic packaging, for appropriate final disposal. [E5.38]

Approximately 54% of all waste generated is **sent for reclamation**. The main examples include the reclamation of WWTP sludges, in agricultural applications, and incorporation of fly-ash and sand from the biomass boilers in cement products and other construction materials. In relation to the waste disposed of, 64% is used to produce energy on site, in Navigator's renewable cogeneration facilities, avoiding the inefficiencies associated with external transport and treatment, contributing to substitution of fossil fuels. Only 16% of the waste generated is sent to **landfill**. [E5.38]

5.2.5.3.4. Anticipated financial effects from important risks and opportunities related to resource use and the circular economy (E5-6)

In accordance with the derogation granted by Delegated Regulation (EU) 2025/1416 of the Commission, of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings, Navigator has opted not to report information on the anticipated financial effects of the impacts, risks and opportunities related to use of resources and the circular economy.

5.2.6. Entity-specific disclosures - Sustainable Forestry Management

5.2.6.1. Strategy

5.2.6.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Promotion of forest management and chain of custody certification by Portuguese partners, through dedicated initiatives and programmes.	Positive impact	--	Amount	(entity-specific disclosure)
Ensure that the wood acquired is obtained from credible (certified) sources, not contributing to deforestation, conversion of natural forests or damage to relevant ecosystems.	Positive impact	--	Amount	(entity-specific disclosure)
Disseminate technical information and training actors in the sector in good forest management practices, including conservation practices for wildlife and relevant socio-cultural heritage.	Positive impact	--	Own operations and upstream	(entity-specific disclosure)
Promote research and innovation related to production and conservation forests and share knowledge of these areas.	Positive impact	--	Own operations and upstream	(entity-specific disclosure)
Protection and conservation of wildlife and social and cultural heritage in the woodlands under the Company's management, both owned and rented.	Positive impact	--	Own operations	(entity-specific disclosure)
Timber certification (FSC, PEFC) and chain-of-custody traceability enhance competitiveness and add value to the timber sourced throughout the entire production chain.	Positive impact	--	Upstream	(entity-specific disclosure)
Contribution to reduction in no./intensity of forest fires through programmes and/or projects, reducing financial losses and positively impacting the social license to operate.	Opportunity	Short term - Reporting year	Own operations	Factors with direct impact on biodiversity loss

NB: the material impacts identified are actual, and so there is no associated time horizon.

At Navigator, sustainable forestry management is intrinsically linked to the Impacts, Risks and Opportunities (IROs) identified in topics E1 (Climate change), E3 (Water and marine resources), E4 (Biodiversity and ecosystems), E5 (Use of resources and circular economy), S2 (Value chain workers), S3 (Affected communities) and G1 (Responsible business conduct) and accords fully with the requirements of the applicable standards.

We take action on two complementary levels: we ensure sustainable management of the woodlands in our care and, alongside this, we promote adoption of good practices throughout our value chain. We promote forest certification, traceability of resources and training in the sector, ensuring that ecosystems are protected and that raw materials are used sustainably. Our approach strengthens environmental resilience and helps to create value throughout the production chain and in Communities, aligning us with the principles of the circular economy and biodiversity conservation. [ESRS 2.48b | ESRS 2.48 cii | ESRS 2.48c iv]

In relation to the woodlands under Navigator's direct management, both owned and rented, we guarantee that the **wood from these holdings is obtained from credible and certified sources**, and does not contribute to deforestation, to conversion of natural forests or to damage to relevant ecosystems. [ESRS 2.48 ci | ESRS 2.48 cii] At the same time, we work to **protect and conserve wildlife and cultural and social heritage** in the woodlands under management, integrating environmental and socio-cultural criteria into our planning and operational models. We also investment in research and innovation in relation to production and conservation forests, working to share knowledge which contributes to more sustainable and resilient practices. [ESRS 2.48 ci | ESRS 2.48 cii]

In this context, the main paper fibre used by the Company (*Eucalyptus globulus*) enjoys advantages over other species, such as its ability to produce paper with a lower specific grammage and using a smaller area of forest, the possibility of more recyclings, resulting in better quality and the potential for use in new products. [ESRS 2.48 ci] | ESRS 2.48 c iv] These characteristics add to the **efficiency of resource use** and contribute to **more circular business models** (Chap. 5.2.5). [ESRS 2.48b]

Throughout the value chain, we promote **forestry management and chain of custody certification by our Portuguese partners**, through dedicated initiatives and programmes, improving standards of traceability and sustainability. [ESRS 2.48a | ESRS 2.48 ci] In addition, **we disseminate technical information and training actors in the sector to adopt good forest management practices**, including conservation practices for wildlife and relevant socio-cultural heritage . [ESRS 2.48 ci]

The dual focus also presents us with a clear opportunity: to **contribute to reducing the number and/or intensity of forest fires**, through specific programmes and projects which reduce financial losses, boost the resilience of forest landscapes and positively impact our social license to operate. [ESRS 2.48a | ESRS 2.48b | ESRS 2.48 ci]

Through our participation in Innovation and Development consortia, we promote research and innovation related to production and conservation forests and share knowledge of these areas. [ESRS 2.48a | ESRS 2.48c iv]

5.2.6.2. Management of impacts, risks and opportunities

5.2.6.2.1. Policies related to sustainable forestry management (MDRP)

Our commitment to responsible management of woodlands, in full harmony with their natural and social surroundings, is also a pledge to take action to counter the forces leading to deforestation and degradation of woodlands, as set out in the **Forest Sector SDG Roadmap** (the framework roadmap published by the Forest Solutions Group, WBCSD, designed to inspire the forestry sector's contribution to the Sustainable Development Goals). [ESRS 2.65d]

We manage our forest holdings in mainland Portugal in keeping with the legal requirements applicable to the sector and other regulations and policies to which we have signed up voluntarily, such as the requirements of Portuguese Standard **NP 4406 on Sustainable Forest Management** and the **Principles and Criteria of the Forest Stewardship Council**. **Certified forest management** allows us to guarantee that the wood used in our products - pulp and paper - is obtained from forests managed on a responsible basis. We have been certified since 2007, by the FSC and since 2009, by the PEFC, and the forest holdings under our management in mainland Portugal are 100% certified under these two schemes. Forest assets in Mozambique are managed in keeping with the legal framework applicable to our operations and the forest management principles and criteria of international certification schemes. Portucel Moçambique has FSC Chain of Custody certification and is in the process of obtaining FSC Forest Management certification. [ESRS 2.65d] Conservation of biodiversity and ecosystem services (Chap. 5.2.4) is an essential part of

this model, seeking to ensure that biodiversity values are maintained or improved through restoration initiatives. We have set out out commitments to promoting sustainable forestry management in our **Forestry Policies** and our **Environmental Policy** (Cap. 5.2.2). By means of these policies we promote the preservation of wildlife and ecosystems and contribute to soil formation and combating erosion, to protecting the forest against fires and regulating the water cycle, attaching value to a form of land use that encourages territorial cohesion and wealth creation. [ESRS 2.65a]

Document	Forestry Policy
Key content and goals [ESRS 2.65a]	In its Forestry Policy, The Navigator Company commits itself to sustainable management of its forestry resources, promoting responsible practices that ensure sustainable production of tangible and intangible goods. This Policy establishes general goals and principles for the forestry management models used by the Company for decision-making.
Scope [ESRS 2.65b]	It applies to Navigator's own operations and has impacts upstream and downstream in the value chain, on Suppliers and local Communities in the Iberian Peninsula.
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• FSC wood certification standards • Portuguese standard PEFC - NP 4406 on Sustainable Forestry Management • Principles and Criteria of the Forest Stewardship Council
Most relevant complementary documentation	• Identification and assessment of environmental and socio-economic issues and impacts (IT 07) • Code of Conduct for Suppliers
Availability [ESRS 2.65f]	Available on the Intranet and online.
References over the course of the non-financial statement	• E1 – Climate change (Chap. 5.2.2) • E3 – Water and marine resources (Chap. 5.2.3) • E4 – Biodiversity and ecosystems (Chap. 5.2.4) • E5 – Use of resources and circular economy (Chap. 5.2.5) • S2 – Workers in the value chain (Chap. 5.3.2)

Our **Forestry Policy** commits us to managing our holdings in accordance with the FSC and PEFC forest certification standards and to implement and promote a responsible forestry management model, both in our own operations and in dealings with our Suppliers, which involves (i) mitigation of potential negative impacts and conservation and restoration of biodiversity and ecosystem services, and (ii) management of biotic and abiotic risks (including those resulting from climate change). We aim in particular [ESRS 2.65a | ESRS 2.65e]:

- To develop and promote the concept of forest plantations which, thanks to the way they are managed, can make a positive contribution to preserving the integrity of ecosystems and protecting high conservation values, assuring effective processes for Stakeholder participation and fostering economic growth and job creation

- To implement a forestry management model for which the good practices are documented in a **Forestry Management System**, and informed by expertise obtained through **Research and Development**, as well as including **measures to mitigate** potential environmental and social impacts.

- Ensure the **health and safety of our Employees**, including that of the **Employees of third parties** providing forestry services, offering them appropriate training/information for the risks assessed.

We also seek to ensure that the production, supply and consumption of raw materials is in line with principles of sustainability and biodiversity protection. We limit purchases of wood and fibre to Suppliers who present proof of responsible practices, avoiding negative impacts on protected areas. For this purpose, we require conformity with the European Timber Regulation (EUTR) and give priority to FSC® e PEFC™ certification, ensuring that natural forests are not converted and traditional rights are not violated. [ESRS 2.65a | ESRS 2.65d]

The Policy makes reference to recognised standards and certifications overseen by third parties, ensuring sustainable practices through **independent audits**. [ESRS 2.65d] In addition, we promote sustainable management of ecosystems, with **continuous biodiversity monitoring, habitat conservation plans and measures to minimise environmental impacts** (Chap. 5.2.4). We invest in **research and partnerships to assess and improve our performance** [ESRS 2.65a]

In our policy we also embrace our role as a **driving force behind expansion of the forestry certification process in Portugal** (see following section). [ESRS 2.65a]

We also refer to the **Portucel Moçambique Forestry Policy**. In order to ensure it generates value and that its activities are recognised by the society as a whole, Shareholders, Employees, Clients, Suppliers and other Stakeholders, the Company has adopted a woodlands management model which: (1) seeks to contribute to maintaining and continuously improving the forest's production, economic, ecological, social and environmental functions, both at the level of individual stands and at the landscape level; (2) is based on criteria developed in keeping with The Navigator Company's good technical, environmental and social practices. [ESRS 2.65a]

Document	**Portucel Moçambique Forestry Policy**
Key content and goals [ESRS 2.65a]	Demonstrates Portucel's commitment to sustainable business management, so as to ensure that its operations are carried on in accordance with best environmental, social and economic practices.
Scope [ESRS 2.65b]	It applies to Navigator's own operations and has impacts upstream of the value chain, on Government and local Communities. Covers all geographical regions in which Portucel Moçambique has operations in Mozambique (Maputo, Manica and Zambézia).
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee of Portucel Moçambique
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• Principles and Criteria of the Forest Stewardship Council • IFC Performance Standards • United Nations Global Compact
Most relevant complementary documentation	• General procedure Management of Environmental Issues (PG80) Forestry Management System • Code of Conduct for Suppliers
Availability [ESRS 2.65f]	Available on website.
References over the course of the non-financial statement	• E1 – Climate change (Chap. 5.2.2) • E3 – Water and marine resources (Chap. 5.2.3) • E4 – Biodiversity and ecosystems (Chap. 5.2.4) • S1 – Own workforce (Chap. 5.3.1) • S2 – Workers in the value chain (Chap. 5.3.2) • S3 – Communities affected (Chap. 5.3.3) • G1 – Business conduct (Chap. 5.4.1)

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Presentation of Environmental Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.2

5.2.6.2.2. Actions and resources related to sustainable forestry management (MDR-A)

In alignment with our 2030 Agenda and Roadmap (Chap. 3.4.4), as peer the goals and targets established (see following section), we invest in programmes to support the **expansion of sustainable and certified forestry management**, and to **help forest landowners**, well beyond the woodlands under our own direct management, in keeping with our ambition to reach a larger number of landowners and encourage them to adopt good practices and to invest in conservation of the natural and cultural heritage in our countryside. These initiatives seek to respond to the individual needs of forestry Partners in Portugal, and the most significant examples are the **Navigator Forestry Producers Club and the Joint Management Units (JMUs)**. These programmes are designed to encourage **knowledge sharing, to promote sustainable forestry management and raw material production, and to boost the skills** of forestry Stakeholders, as well as **protecting** the forest and Communities against **forest fires**.

Through a number of programmes to support Forestry management certification groups, Chain of custody/responsibility groups, Forestry producers' organisations, Companies and Forestry producers, helping to build a common front in defence of the interests of the country's forestry sector.

Main actions: [ESRS 2.68a]	***Status*** [ESRS 2.68a]	**Scope of action** [ESRS 2.68 b]	**Time horizon** [ESRS 2.68 c]	**Results** [ESRS 2.68 to ESRS 2.68e]
Forestry activity in Portugal				
"Discovering Eucalyptus"	Executed	Own operations and downstream value chain operations, in Portugal	2025	In 2025, the Eucalyptus Forum project gave way to the "Discovering Eucalyptus" project, in which we continued our in-depth exploration of forestry topics, and in particular those relating to planted eucalyptus forests. The initiative centred on developing two books: "Eucalyptus - History, Territory and Knowledge", aimed at a general readership, and a more complete book, scientific in character, "Eucalyptus Portugal: Science, Management and Territory". These books were developed on the basis of the scientific and technical knowledge brought together by the Eucalyptus Forum, drawing on the contributions, opinions and suggestions of some 400 experts and leading figures in the sector. Also as part of the "Discovering Eucalyptus" project, the celebrations for the International Day of Forests and World Tree Day on 21 March 2025 included several initiatives which resulted in editorial content on eucalyptus being broadcast live on two of Portugal's leading news channels (TVI and CNN Portugal). There was also a live broadcast on Rádio Observador from RAIZ, Navigator's forestry research institute, with a focus on research and innovation. Over the course of the 2025, the "Discovering Eucalyptus"" also evolved through dozens of podcasts, interviews, multimedia reports and articles online and in the press.

Main actions: [ESRS 2.68a]	***Status*** [ESRS 2.68a]	**Scope of action** [ESRS 2.68 b]	**Time horizon** [ESRS 2.68 c]	**Results** [ESRS 2.68 to ESRS 2.68e]
Navigator's Forestry Producers Club	Executed and planned	Upstream operations with Landowners, Forest associations, Service providers and Suppliers of wood and biomass, in Portugal.	Ongoing action	Promotion of the hiring of 17 people for forestry sector companies; funding of 1.3 M€ for renewal of machinery; development investment of 1.9 M€, through a banking agreement with Crédito Agrícola and effective saving of 100 k€, for some 60 companies, thanks to the fuel supply agreement with Galp, Moeve and Oz Energia.
Support programmes for forestry producers - incentive for supply of certified wood	Executed and planned	Upstream and downstream operations, in Portugal	Ongoing action	Continuation of incentive for supplies of certified wood (absolute value of 4 €/m^3)
Support programmes for forestry producers - support for forest management certification groups	Executed and planned	Upstream and downstream operations, in Portugal	Ongoing action	Technical support for 18 entities, including forestry management and/or chain of responsibility certification groups and other forestry producers organisations.
Programmes to support forestry producers TecFlorest	Executed and planned	Upstream and downstream operations, in Portugal	Ongoing action	67 sessions were held, with a total of 672 participants, promoting transfer of technical-scientific knowledge and tools supporting forest management.
Programmes to support forestry producers – Premium Programme	Executed and planned	Upstream and downstream operations, in Portugal	Ongoing action	Free technical support (97 recipients), open to all owners of eucalyptus forests, covering 2514 ha
Supportr programmes for forestry producers - Better Eucalyptus and Better Forest	Executed and planned	Upstream and downstream operations, in Portugal	Ongoing action	Project undertaken through Biond (Navigator and Altri), association representing forest-based bioindustries, also increasing the Group's intervention in the sector. As part of the Better Eucalyptus Programme, the "Clear & Fertilise" initiative has funded fertilisation for landowners' holdings and, up to 2025, the programme has reached 88 546 ha, of which 17 358 ha have been fertilised twice, supporting a total of 11 488 Forestry Producers, mostly the owners of smallholdings. In addition, the Recovery of Burned Areas programme is under way, and involved work on a total of 1510 ha up to the end of 2025. Alongside this, the Better Forest Project has continued, benefiting 1476 ha by year-end 2025.
Joint Management Units (JMUs) - this is a ground-breaking forestry management instrument, designed especially for smallholders.	Executed and planned	Upstream and downstream operations, in Portugal	Ongoing action	Support was provided in 2025 for 279 plots, corresponding to a total area of 547 ha. All these areas have certified management.
Assessment of impacts on natural, cultural and social heritage, prior to forestry operations.	Executed and planned	Own operations, in Portugal	Ongoing action	Drafting of 371 checklists for operations considered as having the greatest impact on the surrounding environment.

Main actions: [ESRS 2.68a]	***Status*** [ESRS 2.68a]	**Scope of action** [ESRS 2.68 b]	**Time horizon** [ESRS 2.68 c]	**Results** [ESRS 2.68 to ESRS 2.68e]
Project 3.6 Soil Biome: improve the soil-plant relationship	Executed and planned	Own operations, in Portugal	Ongoing action	The results suggest that there is the possibility of reducing mineral nitrogen fertilisation, even in soils poor in organic matter, however, further research is needed, in order to establish the maximum reduction possible, without drops in yields, with the benefit of applying biofertilisers.
transForm 1.5 - Remote detection data for forest management	Executed and planned	Own operations, in Portugal	2023-2026	Preparation of land occupation maps based on Sentinel-2 images (resolution of 10m); annual maps of age classes of maritime pine and common eucalyptus, on the basis of Landsat and Sentinel-2 images; annual inventory maps of maritime pine and common eucalyptus based on Sentinel-1 and Sentinel-2 images; post-fire landscape evolution maps with Sentinel-2 imaging; Development of warning platform and fire hazard forecasting (resolution of 10m with daily updates). Development of a forestry operations monitoring system using drones and satellite images.
Forestry Activity in Mozambique				
Audit of environmental and social compliance	Executed and planned	Downstream operations with the Government of Mozambique, in Mozambique.	Ongoing action	Action envisaged in the Mozambican legal framework which provides annually for an external independent audit, to assess compliance with the Environmental Management Plan (which plan is based on the potential negative and positive impacts that result from the forestry project). Two environmental and social compliance audits in Manica and Zambézia provinces.
Water and soil monitoring.	Executed and planned	Operations downstream with Employees and Forestry services providers, in Mozambique	Ongoing action	On an annual basis we monitor the hydrographical basins where we occupy no les than 15% of the land, in order to assess water quality parameters, upstream and downstream, assessing the impact of plantations on water quality. The programme also provides for monitoring of soil fertility, from soil samples taken at three different times (T0 - prior to installation of stand; T1 - 1 year after 2nd maintenance fertilisation, when the stand is 3 years old; and T2 - in the year or just before harvesting the wood), permitting assessment of the soil, at the same location, over the eucalyptus growth cycle (8 years, in Mozambique).
Environmental education programme in Communities	Executed and planned	Own operations with Communities, in Mozambique	Ongoing action	Environmental awareness raising in Communities, in order to promote sustainable practices in the areas where we operate: Awareness raising of 4360 persons; 141 sessions.
Expand knowledge and restoration areas	Executed and planned	Own and downstream operations, with Communities, in Mozambique	2025-2030	Contracting of areas only and exclusively for conservation. Identification of costs associated with restoration. Capacity to engage with the Community on the goal of preservation. Engagement and meetings with potential partners (nursery operators, acquisition of further experience in the region, etc.).
FSC Forestry Management Standard adapted to Mozambique	Executed	Own operations and operations downstream in value chain, in Mozambique	2025	Portucel Moçambique's participation in adaptation of the FSC Forestry Management Standard to Mozambique was of strategic and structural importance, with direct impact on forest governance, environmental protection, Community rights and working conditions. Technical collaboration and field trips with FSC Africa helped to ensure that the standards adequately reflects the setting in Mozambique, maintaining the international standards of forest sustainability and responsibility.

Main actions: [ESRS 2.68a]	*Status* [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.68 to ESRS 2.68e]
Setting of conservation priorities in Portucel Moçambique's two licensed areas (DUATs)	Executed	Own operations in Mozambique	2025	In partnership with the Wildlife Conservation Society (WCS), a multi-criterion spatial analysis was carried out, in order to set conservation priorities within Portucel's DUAT areas. This work has provided significant support for the Company's management, in focussing its conservation efforts where they are most relevant.

Note 1: No negative material impacts and only positive impacts have been identified, meaning that no remediation actions are identified. It should nonetheless be noted that we systematically identify and assess the environmental and social impacts of forestry activities, resulting in the matrices used during the planning and execution of operations, enabling us to avoid negative impacts or to adopt the appropriate measure when these impacts occur. In the course of this assessment we also consult local Stakeholders, such as the local Community and/or specialists in the different natural, social and cultural factors under assessment. The communication channels that affected Stakeholders can use, for remediation of the negative impacts of these operations, include our website, the whistleblowing channel and regular consultations conducted in forestry operations (Chap. 5.3.3). [ESRS 2.68d]

We have pressed ahead with **programmes to support forestry producers**, seeking to promote better yields, resilience and sustainability in Portugal's forests, engaging with eucalyptus sector operators and thereby contributing to development of rural areas and boosting know-how transfer. [ESRS 2.68a]

Faced with the problem of **forest fires** and the consequent social, economic and environmental impacts, we have invested in **prevention** through **good forestry practices**, so as to make the forest holdings under our management more resilient. We carry out on a regular work on: maintenance of paths and fire breaks;, control of vegetation, reduction of duel load and creation of areas to break up the landscape. We also invest in **support for fire-fighting**, through Afocelca, Empresa de Proteção Florestal and as members of Biond Forest Fibers from Portugal **we support the recovery of burned areas**, in particular by taking part in the Derreada project (Pedrógão). These initiatives are designed to reduce the fire risk, control invasive species and restore the production potential of affected forests. Despite these continuous efforts, a total of 2635 ha burned in 2025, due above all to fires in August in central and northern Portugal, affecting various areas under the Company's management (see section "Targets and metrics").

As part of the transForm Agenda, we have worked on Project 3.6 Soil biome, which sets out to research the use of biofertilisers, with effectiveness already demonstrated in improving the soil quality and crop health in agriculture, and the respective yields, in order to adapt them to the forestry sector, so as to reduce the use both of mineral fertilisers and of pesticides. To this end, adjustments are being made to formulations based ion living microorganisms (such as bacteria and mycorrhizal fungi) and fermented by-products, taking into account their effectiveness and applicability in a forestry setting. The results suggest that there is the possibility of reducing mineral nitrogen fertilisation, even in soils poor in organic matter, however, further research will be needed, in order to establish the maximum reduction possible, without drops in yields, with the benefit of applying biofertilisers.

Another project under the transForm Agenda, in which the participants are Navigator Forest Portugal, RAIZ, Altri, the Directorate-General for Territory and Razão d'Igualdade, involves obtaining remote sensing data for forest management. A number of initiatives have been undertaken to develop methodologies and data models, with the aim of using remote sensing technologies and data to accompany or monitor forestry activities sustainably, supporting decision-making by the respective Stakeholders. This has included classification of land use and occupation and detection of changes on a two-monthly basis, development of mapping products obtained using satellite remote sensing and artificial intelligence techniques for characterising forest stands, development of new hazard forecasting models (fires and pests) and preparation of new thematic maps adapted to the needs of forest managers.

Active efforts have also been made in this field in Mozambique, through a strategy of implementing measures across all operations, duly followed up and monitored, including the use of controlled burning (or cold burning), manual harrowing/digging, clearance of paths and fire breaks, training of forest guards and rapid intervention teams based at various locations, minimising

the potential for fires to spread, placement of beehives around the edges of forests to encourage protection of a family asset, as well as awareness raising, aimed both at Employees interacting with Communities. [ESRS 2.68 a]

In addition, we are active as a **member of CT 145 - Technical Commission for Sustainable Forestry Management**. We have contributed to a great variety of working parties under this commission, taking part in the drafting of documents and recommendations on standards, in the field of forestry management, helping to strengthen Navigator's stance on these issues. This has been an active and dynamic process, enabling us to update and adapt standards to the realities of Portuguese forests, with a large number of small and medium-sized forestry producers. [ESRS 2.68a]

In Mozambique, we continued, on a smaller scale, to take part in the **Mozambican government's programme for promoting forestry** in Zambézia province (MOZ-RURAL), by supplying plants, at a discount cost, for new areas. This project sets out to raise the income of beneficiaries in the selected areas, to increase the aggregate value of Producers and/or the respective Associations, created for this purpose, to boost yields and improve access to the wood market, all achieved through good forestry practices. [ESRS 2.68a]

5.2.6.3. Targets and metrics

5.2.6.3.1. Targets related to sustainable forestry management (MDR-T)

In our 2030 sustainability Roadmap (Chap. 3.4.4), we established a series of goals/targets related to **sustainable forestry management**, covering goals related to:

- Consumption by the Company of certified wood;
- Chain of custody certification of the Company's wood suppliers;
- Training for Forestry producers and dissemination of technical information;
- Monitoring of impact of production forests on water management;
- New genetic material;
- New tools for biological control of pests and diseases;
- Reduction of rural wildfires;
- CO_2 stock s in woodlands under Navigator's management.

In the wider context of sustainability and in alignment with our established policies and commitments, it should be noted that these targets contribute to several SDGs, in particular SDG 12 (Responsible Consumption and Production), 13 (Climate Action) and 15 (Protect Life on Land).

Goal and target [ESRS 2.80]	Baseline [ESRS 2.80d]	Associated metrics [ESRS 2.75] [ESRS 2.80b]	Performance 2023 [ESRS 2.80j]	Performance 2024 [ESRS 2.80j]	Performance 2025	Target to achieve [ESRS 2.80e]
Ensure that the Company's wood consumption includes no less than 80% certified wood by 2030.	Benchmark value: 74% Baseline: 2020	Certified wood used as percentage of total wood consumed.	69%	73% (72.94% sourced from Portuguese market and 73.39% considering all certified origin wood received by Navigator).	84% (78.52% sourced from Portuguese market and 84.18% considering all certified origin wood received by Navigator).	Value/outcome to achieve: 80% Year: 2030
Promote chain of custody certification of all our wood Suppliers, by 2030.	Benchmark value: 74% Baseline: 2020	Percentage of wood Suppliers with chain of custody certification	92%	92%	93%	Value/outcome to achieve: 80% Year: 2030
Introduce and establish natural enemies for 2 eucalyptus pests	Benchmark value: *Anagonia* and *Cleruchoides* not established in Portugal Baseline: 2023	Impact on respective pests yet to be determined (parasitism rate)	-	Production and release of 2 natural enemies *Anagonia* and *Cleruchoides.*	Production and release of 2 natural enemies *Anagonia* and *Cleruchoides.* Prospecting in Australia to identify potential natural enemies for another 3 eucalyptus pests: *Trachymela, Ophelimus* and *Phoracantha*.	Value/outcome to achieve: *Anagonia* and *Cleruchoides* established in Portugal, with impact on respective pests (parasitism rate yet to be determined) Year: 2030
Identify, at least, 1 natural enemy for *Acacia dealbata* and introduce it in Portugal	Benchmark value: 6 species of defoliating insects identified Baseline: 2024	No. of natural enemies of *Acacia dealbata* introduced in Portugal	-	Several natural enemies of *Acacia dealbata* have been imported and 6 insect species have been identified, which are under study, in a confined environment.	Populations of 4 natural enemies have been established, in confined environments at RAIZ. Biological studies have been carried out and work has started on host specificity studies.	Value/outcome to achieve:: 1 natural enemy of *Acacia dealbata* introduced in Portugal Year: 2030
Ensure the e-globulus platform reaches more Portuguese forestry producers and provides effective support.	Benchmark value: No. of users (to date): 600 or No. of registered users (to date): <100	Number of users (to date) and/or - Number of registered users (to date)	More than 20 thousand users accessed platform; 850 registered users. More than 82 hits	27 733 users accessed platform (to date). 1 040 registered users (to date).	33 663 users accessed platform (to date). 1 114 registered users (to date).	Value/outcome to achieve: No. of users (to date): 35,000 or No. of registered users (to date): 1250 Year: 2030

Goal and target [ESRS 2.80]	Baseline [ESRS 2.80d]	Associated metrics [ESRS 2.75] [ESRS 2.80b]	Performance 2023 [ESRS 2.80j]	Performance 2024 [ESRS 2.80j]	Performance 2025	Target to achieve [ESRS 2.80e]
	Baseline: 2019		(to date).			
Monitor impact of production forests on water management	Benchmark value: Qualitative Baseline: 2019	Installation of two experimental forest basins in order to quantify flow and monitor hydrological responses	-	Frequent gathering of field information and integration in eco-hydrological model, improved knowledge of the interaction between plantations and water use.	Ongoing, basin monitoring. Modelling of eco-hydrological responses of two hydrographical basins dominated by eucalyptus, with contrasting soil and climate characteristics, in relation to future climate scenarios (manuscript drawn up for submission). New study with external R&D entity to assess water source used by different forms of occupation.	Value/outcome to achieve: Knowledge of the hydrological dynamic in trial forest basins and the relationship with forestry management, embodied in published articles and other forms of dissemination. Year: 2030
Consolidation of Navigator Forestry Producers Club (goal reformulated in 2025)	Baseline: 2023	Not applicable	-	Target achieved in 2024.	Ongoing capacity to reach more actors in the sector: 600 more members Consolidation of benefits: Launch of first jobs website exclusively for the forestry sector, leading to hiring of 17 people for several companies; funding of 1.3 M€ for renewal of machinery; development investment of 1.9 M€, through a banking agreement with Crédito Agrícola and effective saving of 100 k€, for some 60 companies, thanks to the fuel supply agreement with Galp, Moeve and Oz Energia.	<u>Interim targets:</u> • Secure 100 new club members in 2026; • Consolidate existing benefits and launch range of new benefits.
Consolidate Forestry Producers project, promoting and disseminating technical information about forestry production, helping to share best practices, by 2030.	Baseline: 2020	No. initiatives/year (digital and in-person): 10 No. forestry producers reached/year: 10 thousand	Attendance of 9 trade events in the agro-forestry sector in Portugal and Galicia; 2 campaigns to contract forest land in Galicia; 3 editions of magazine with average print run of 15 thousand	11 initiatives (attendance of 10 trade events in the agro-forestry sector in Portugal and Galicia; 1 campaign to contract forest land in Galicia; 4 editions of magazine with average print run of 15 thousand copies;	7 initiatives (attendance of trade events in the agro-forestry sector in Portugal); 3 editions of magazine in Portugal, with average print run of 15 thousand copies; 1 edition of magazine in Spain, with print run of 12 thousand copies; more than 200 online content items; 144 participants in 5th Meeting of Forestry Producers; Impact on Community of more than 21 thousand people.	<u>interim targets adjusted in 2025</u>: 50 initiatives for contact with Forestry producers by 2028. Hold 8 Forestry Producers Meetings, by 2030;

Goal and target [ESRS 2.80]	Baseline [ESRS 2.80d]	Associated metrics [ESRS 2.75] [ESRS 2.80b]	Performance 2023 [ESRS 2.80j]	Performance 2024 [ESRS 2.80j]	Performance 2025	Target to achieve [ESRS 2.80e]
			copies; 200 online content items; 111 participants in 3rd Meeting of Forestry Producers; Impact on Community of more than 15 thousand people.	more than 200 online content items; 130 participants in 4th Meeting of Forestry Producers; (interim target achieved in 2024) Impact on a Community of more than 18 thousand people.	(interim targets achieved in 2025)	(Secure 100 new club members, by 2028. Year: 2030
Help reduce rural fires, seeking to ensure that the burned area under Navigator's management stays below 1% each year.	Benchmark value: 2.1% Baseline: 2018	% of burned area under Navigator's management	1.8%	2.66%	2.37%	Results to achieve: <1%/year Year: 2030
Ensure that the stock of CO_2 sequestered in the forest holdings under Navigator's management does not fall by more than 10% in relation to 2022 (baseline year), up to 2030.	Benchmark value: 6.1 Mt CO_2eq. Baseline: 2022	Accumulated CO_2 stock sequestered in woodlands under Navigator's management (Mt CO_2eq.). Variation in stock of CO_2 sequestered in the forest holdings under Navigator's management in relation to 2022 (reference year)	6.2 Mt CO_2eq.	6.4 Mt CO_2eq. (up 4.9% on 2022)	6.6 Mt CO_2eq. (up 8.2% on 2022) (calculation methodology altered in 2025)	Value/outcome to achieve: Positive variation in stock of CO_2 sequestered in the forest holdings under Navigator's management in relation to 90% of the 2022 value (reference year) Year: 2030

Note: The geographical scope for the targets established is mainland Portugal. [ESRS 2.80c | E4.32d]

Setting of targets

The targets established for sustainable forest management are aligned with the policies identified above, reflecting Navigator's commitment to promoting responsible forest management, ensuring conservation of ecosystems, improvement of biodiversity and efficiency in use of natural resources, in accordance with Portuguese Standard PEFC - NP 4406 and with the FSC Principles and Criteria. The Company has adopted practices consistent with both these systems of standards, helping to prevent illegal forestry operations and controlling the origin of the wood purchased. Maintains and improves management of woodlands, in a balance with their natural and social surroundings, promoting actions that avoid deforestation, degradation or conversion of forests. Develops and encourages plantations which protect high conservation values and fosters effective processes for Stakeholder participation, deriving economic growth and employment. The forest management model is based on good practices documented in a Forestry Management System, informed by research and development, with measures to mitigate environmental and social impacts.

We encourage our Suppliers to adopt responsible practices, through support, knowledge transfer and monitoring, as well as taking a proactive stance to collaborating with Forestry producers and other actors in the sector, promoting certification and countering factors which may lead to degradation of forests. We are also committed to continuous improvement of our Forestry Management System, and to providing information on its, establishing and updating aims, in keeping at all times with the commitments made in our Forestry Policy. [ESRS 2.80a]

Both economically and environmentally, biological control of pests is an effective and sustainable solution. Implementation enables us to reduce the negative impact of pests, helping to improve yields and the resilience of Portugal's eucalyptus forests. [ESRS 2.80a] Biological control is a method which entails introducing specific natural enemies of these pests, in order to reduce their impact. The selection and introduction of natural enemies is a slow process, requiring detailed studies to ensure that biological control agents are effective and will not have negative impacts. **RAIZ** (Chap. 3.4.2) has a biofactory and specialist technicians with the skills needed to import, study, produce and release the natural enemies of eucalyptus pests. The biological control solutions applied in Portugal benefit not only Navigator, but also all other Forestry producers, given that the natural enemies act throughout the area where the target pests are established. [ESRS 2.80f]

The **development of cloned plants and genetically improved seeds** is aligned with the forestry policy, promoting renewal of the eucalyptus production forest with the use of improved clones and seeds, enabling improved performance, i.e. better growth and/or resilience to pests and diseases and to climate change. It contributes to: (1) maximising the yields from production areas, reducing the pressure on other areas for non-production uses (conservation/ preservation); (2) mitigation of the proliferation of pests and diseases through the use of plants more resistant to these biotic agents, contributing to improved plant health in the country's forests. [ESRS 2.80a]

The methodology used to establish the target is based on **conventional genetic improvement techniques**, consisting mainly of selection of progenitors, controlled hybridisation plans, trials to tests the descendants obtained and finally, selection of new progenitors and restarting the improvement cycle. Improvement between cycles is monitored using statistical analysis techniques such as BLUP (Best Linear Unbiased Prediction), ordering all the individuals in the programme on the basis of the value of gains. The variables to be improved are: growth (volume of wood), survival, wood density and pulp yield. Information on nursery performance (measured by rooting) and qualitative information on resistance to pests and diseases is aggregated in addition to genetic gains, and may have a significant restrictive impact on selection. Periodically, clones successively improved on one or more of the criteria indicated are identified, and recommended to Viveiros Aliança (clone portfolio) for large scale plant production. [ESRS 2.80f]

It should be noted that climate regime conditions and pest and disease resistance conditions require the development of customised solutions, with a broader portfolio which allows for choices of genetic material better suited to different local soil and climate conditions (cold, drought, biotic risks). These solutions are used not just by Navigator, but also by Forestry producers who have access to the plants produced at our nurseries, thereby promoting the environmental and economic sustainability of the industry, contributing to development of the forestry sector as a whole. [ESRS 2.80f]

The improved **reach and effectiveness of the e-globulus platform** in relation to Portuguese forestry producers is one of the targets stipulated by Navigator in connection with sustainable forest management. This platform is a tool that encourages responsible and sustainable forest management and helps improve technical skills. It is aligned with the disclosure of good practices and transfer of knowledge to the general public (Forest landowners, Forestry officers and other stakeholders, Academe and others). [ESRS 2.80a] The e-globulus platform is designed to encourage adoption of forestry management practices appropriate to local conditions. It is a tool for knowledge transfer which can be used by Navigator, Forestry producers and others in the sector, among others. User interest in the platform is assessed quantitatively and, as for other online platforms, by monitoring the indicators recorded, such as the number of users and hits. [ESRS 2.80f]

Management of water resources is extremely important for forestry production. Continuous improvement of management practices is based on the technical and scientific knowledge which is generated over time. This is pursued not only through the study of trial basins, and we also invest continuously in knowledge of how the soil and climate influence the production capacity of stands and studying silviculture practices tailored to local conditions. We look at plant growth, and also at conservation and improved retention of water in the soil. This target is related to a research project, in partnership with the University of Aveiro, which consists of monitoring two trial basins equipped with instrumentation to assess water availability (quality and quantity), seeking to understand the dynamic of the hydrological response over the development cycle of forest stands. In addition, this data is also being used to feed hydrological modelling (with the SWAT model – Soil and Water Assessment Tool); scientific articles have already been published in international journals and this work has been presented at scientific conferences. [ESRS 2.80f]

Advance Forest seeks to equip Forestry Operators, Technicians and Produicers with up-to-date skills in the use of advanced technologies in forestry operations and practices for assessing stands and safety in silviculture and forest harvesting activities. It is aimed at young people and offered as refresher training, reaching out to 78 FPOs (Forestry Producers' Organisations), members of Forestis and Fenafloresta.

Internal and external Stakeholders were involved in setting the targets, through the different forums and procedures for dialogue, such as the **Environmental Board** and the **Sustainability Forum**, seeking to ensure transparency and alignment with the expectations of the Communities, Authorities and Experts. [ESRS 2.80h]

Some of the targets were adjusted in 2025, together with the methodology for calculating some of the goals. Goals were also reformulated and new goals established, in a process of continuous improvement. [ESRS 2.80i]

Performance in relation to the target [ESRS 2.80j]

Over the course of 2025, an 11% increase was recorded in the use of certified wood in relation to 2024, ensuring that, by 2023, at least 80% of wood consumed is certified. We accordingly promote chain of custody certification of our wood Suppliers, increasing the percentage of those with certification.

In the field of plant health protection, two natural enemies for two significant eucalyptus pests were produced in the biofactory and released in the field, and monitoring is in progress to assess their effect in real conditions. In addition, prospecting work in Australia sought to identify potential natural enemies for another three eucalyptus pests - *Trachymela*, *Ophelimus* and *Phoracantha*. With regard to *Acacia dealbata*, populations of four natural enemies have been established in confined environments at RAIZ. Biological studies have been conducted and host specificity studies started.

In relation to genetic improvement, the target of developing cloned plants and genetically improved seeds, with yield gains of between 30% and 50% and more resilient to climate change, is reviewed annually in coordination with internal Stakeholders. This process has made it possible to prioritise selection criteria, such as growth, survival and wood quality, and also to establish restrictive filters related to rooting and resistance to pests and diseases. Production of improved seeds is an additional and competitive solution for the provision of between quality plants, whilst ongoing incorporation of new genetic material makes for more robust analysis and adds to the possibilities for future recommendations.

With regards to training and support for Forestry producers, several sections of the e-globulus platform were improved in 2025, including "e-Science"; functional improvements were made and new content produced. The platform remains responsive, functional and up-to-date for public consultation, and its use is monitored through indicators from Google Analytics.

In relation to monitoring of the impact of production forests on water management, research was carried further in 2025 into the effects of climate change and phased operations on two Portuguese forest basins with contrasting soil and climate conditions. In particular, this work has involved analysis of water and biomass production and assessment of the water scarcity and availability index. A new study has been started in collaboration with an academic partner, to assess the water sources used by different species.

In relation to consolidation of the Navigator Forestry Producers Club, the goals set for 2025 were achieved, with a significant increase in the number of the sector Stakeholders joining the Club, which now has more than 600 members. Uptake of the benefits offered has been consolidated, resulting in particular in the hiring of 17 people for forestry sector companies, funding of 1.3 M€ for renewal of machinery, development investment of 1.9 M€, through a banking agreement with Crédito Agrícola and effective saving of 100 thousand euros for some 60 companies, thanks to the fuel supply agreement with Galp, Moeve and Oz Energia. Efforts have continued to promote active forestry management through programmes of support promoted through the Club platform.

The Forestry Producers project, geared to promotion and dissemination of technical information on forestry production and sharing of good practices by 2030, also achieved the interim targets established for 2025. Seven initiatives were executed, with a presence at agro-forestry trade events in Portugal,. the magazine editions published in Portugal, with an average print run of 15 thousand copies, and one edition in Spain, with a print run of 12 thousand copies. In addition, more than 200 online content items were produced, there were 144 participants at the 5th Meeting of Forestry Producers and an impact achieved on a community of more than 21 thousand people.

In relation to reduction of the wildfire risk, priority was again attached in 2025 to preventive silviculture, with a focus on fuel management. With regard to fires, we were able to rely on Afocelca's resources, supporting fire-fighting operations in situations which posed a risk to assets under our management. Even so, the central and northern regions of Portugal were severely affected by large fires, creating an impact on the assets under the Company's management, with a burned area of approximately 2 635 hectares.

Lastly, in relation to the target of ensuring that the CO_2 stock sequestered in the woodlands under Navigator's management does not fall by more than 10% in relation to 2022, there was a positive increase in 2025 of approximately 171 kt in the stock of sequestered CO_2. The methodology for counting carbon in the soil is still at the development stage, and the work commenced in the previous year in collaboration with RAIZA has continued.

5.2.6.3.2. Impact metrics related to sustainable forestry management (MDR-M)

Metrics	2025	2024
Accumulated CO_2eq stock in our forests		
Portuguese forests, owned by Navigator	6.6 M tCO_2eq	6.4 M tCO_2eq
Area of eucalyptus	5.4 M tCO_2eq	5.3 M tCO_2eq
Area of cork oak, conifers and other forestry species	1.0 M tCO_2eq	0.9 M tCO_2eq
Farmland, with shrub species or scrubland	0.2 M tCO_2eq	0.2 M tCO_2eq
Portucel Moçambique's eucalyptus forests	4.0 M tCO_2eq	2.7 M tCO_2eq
Total	**10.6 M tCO_2eq**	**9.1 M tCO_2eq**
Certified forest area in mainland Portugal		
Certified (FSC or PEFC) forest area in mainland Portugal	110 741 ha	108 654 ha
Breakdown by type of area under management, in mainland Portugal		
Area of eucalyptus	80 279 ha	79 791 ha
Area of other forestry species	10 177 ha (9% area managed by Navigator)	10 023 ha (9% are managed by Navigator)
Area of other land uses	20 285 ha (18% of area managed by Navigator)	20 104 ha (18% of area managed by Navigator)
Total forests under management		
Area in Portugal	110 894 ha	108 807 ha
Area in Spain	1488 ha	1111 ha
Area in Mozambique	26 932 ha	26 932 ha
Total	**139 314 ha**	**136 850 ha**
Total hectares of forest, owned, rented of managed, which has been converted to plantations or non-forestry forms of land use since the cut-off date of 2020		
Area in Portugal	0 ha	0 ha
Area in Spain	0 ha	0 ha
Area in Mozambique	0 ha	0 ha
Number of trees planted		
Number of trees planted in Portugal	3.6 M	3.4 M
Number of trees planted in Mozambique	0.0645 M (*Eucalyptus grandis urophyla and Eucalyptus urophyla* plants)	0.3 M (*Eucalyptus grandis urophyla* plants)
Number of plants produced in nurseries		
Nurseries in Portugal	8 465 624 (forestry and ornamental plants)	7 731 275 (forestry and ornamental plants)

Metrics	2025	2024
Nurseries in Mozambique	2 123 418 (only Eucalyptus spp)	1 519 755 (only Eucalyptus spp)
% Burned area under Navigator's management		
Mainland Portugal	2.37% (% in ha)	2.66% (% in ha)
Mozambique	0.2%	0%
e-globulus		
Number of total users	33 663 (accumulated)	27 733 (accumulated)
Number of hits	111 154 (accumulated)	91 854 (accumulated)
Number of registered users	1114 (accumulated)	1040 (accumulated)
Number of reports, events and news items	more than 80	more than 35
Navigator's Forestry Producers Club		
Number of registered members	622 (accumulated)	367
Members' turnover	~697 M€	538 M€
Employee headcount declared by members	4027	2680
Investment in infrastructures and services for forest fire defence		
Investment in fire prevention and support for fighting forest fires, in Portugal	10.95 M€	8.80 M€
Afocelca activities in Portugal	3.29 M€	3.02 M€
Clearance and vegetation control activities in Portugal	7.14 M€	5.40 M€
Maintenance of paths and fire breaks in Portugal	0.51 M€	0.46 M€
Provision of specific PPE in Mozambique	13 000€	2448€
Fire Prevention and Fire-Fighting Services - human and material resources in Mozambique	37 394€	101 673€
Manual digging vs. Harrowing in Mozambique	114 814€	147 113€
Cold burning (controlled burning) in Mozambique	48 417€	161 157€
Pre-burn cutting in Mozambique	29 050€	107 828€
Supply of certified wood		
Certified wood on Portuguese market	78.52%	72.94%
Certified wood as proportion of all wood purchased - Domestic and international market	84.18%	73.39%

Methodological notes: Accumulated CO_2eq stock in our forests

The stock of CO_2eq in the forest is calculated on the basis of quantification of forest biomass, considering data from the forest inventory, species managed and area, and subsequently converted into carbon and into carbon dioxide using recognised conversion factors.

Methodological notes: Certified forest area in mainland Portugal

The target is monitored on the basis of the total forest area in mainland Portugal, managed by the Company and compliant with the requirements of Portuguese Standard PEFC - NP 4406 on Sustainable Forestry Management and the Principles and Criteria of the Forest Stewardship Council.

Methodological notes: Breakdown by type of area under management, in mainland Portugal

The target is monitored on the basis of the total forest area in mainland Portugal, managed by the Company and certified, breaking down as follows:

- Total area of eucalyptus;
- Total area of other forestry species, other than eucalyptus;
- Farmland, with shrub species or scrubland.

Methodological notes: Total forests under management

The target is monitored on the basis of the total forest area, managed by the Company and certified, breaking down as follows:

- Total area in Portugal;
- Total area in Spain;
- Total area in Mozambique.

Methodological notes: Total hectares of forest, owned, rented of managed, which has been converted to plantations or non-forestry forms of land use since the cut-off date of 2020

The target is monitored on the basis of the total forest area, managed by the Company and converted to plantations or non-forestry uses, as from 2020, breaking down as follows:

- Total area in Portugal;
- Total area in Spain;
- Total area in Mozambique.

Methodological notes: Number of trees planted

The target is monitored on the basis of the number of trees planted, in the total forest area managed by the Company, in Portugal and Mozambique.

Methodological notes: Number of plants produced in nurseries

The target is monitored on the basis of the number of plants produced in nurseries, in Portugal and Mozambique.

Methodological notes: % Burned area under Navigator's management

The target is monitored on the basis of the total burned area and the total forest area managed by the Company, in mainland Portugal and Mozambique.

Methodological notes: *e-globulus*

The target is monitored on the basis of data from Google Analytics, and automatically counted, with regard to the number of registered users; it is visible in real time, for those accessing the platform. All content items are visible with date of public release.

Methodological notes: Navigator's Forestry Producers Club

The target is monitored on the basis of contributions from members, analysing three main dimensions representing their activity and impact:

• Number of registered members

The total number of members registered in the period is assessed, reflecting the Club's ability to attract membership and grow.

• Turnover of members

The aggregate turnover is considered, making it possible to measure the economic power and representativeness of the members in the sector.

• Total workforce

Counted as the total number of Employees of member companies, pointing to the social and employment dimension of the membership.

Methodological notes: Investment in infrastructures and services for forest fire defence

The target is monitored on the basis of total investment, in Portugal, breaking down as follows:

- Investment in forest fire prevention and support for fire-fighting
- Afocelca Activities
- Vegetation clearance and control activities, which include the following operations: Manual, mechanical and chemical control of vegetation, 1st and 2nd selection of saplings and land preparation operations (removal of stumps, mechanical destruction of stumps, harrowing, construction and widening of terraces).
- Maintenance of paths and fire breaks

Methodological notes: Supply of certified wood

The target for supply of certified wood is monitored by tracking volumes of wood purchases, checking to what extent they are obtained from certified sources.

5.3. Social Disclosures

5.3.1. ESRS S1: Own workforce

5.3.1.1. Strategy

5.3.1.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Improvement of job security of Workers switched from fixed-term to permanent contracts	Positive impact	--	Own operations	Job security
Shift work impact the quality of life and also physical and mental health	Negative impact	--	Own operations	Working hours
Payment of attractive wages (monetary benefits) and award of non-monetary benefits promotes employee satisfaction.	Positive impact	--	Own operations	Adequate wages
Payment of attractive wages (monetary benefits) and award of non-monetary benefits promotes Employee satisfaction, improving workforce retention and productivity.	Opportunity	Short term - Reporting year	Own operations	Adequate wages
Promotion of social dialogue between Management and Workers' representatives facilitates greater engagement by Workers in common interests, which can have an impact on Workers' conditions.	Positive impact	--	Own operations	Social dialogue
	Positive impact	--	Own operations	Freedom of association, existence of works councils, and the right of Workers to information, consultation and participation
Increased bargaining power of Workers covered by collective agreements.	Positive impact	--	Own operations	Collective bargaining, including rate of Workers covered by collective agreements.
Work-life balance contributes to the health and well-being of Employees.	Positive impact	--	Own operations	Work-life balance
Workforce training and continuous skills assessment contribute to professional and personal growth by Employees.	Positive impact	--	Own operations	Training and skills development

Description [ESRS 2.48a]	Impact, Risk or Opportunity [ESRS 2.48a]	Time horizon [ESRS 2.48ciii]	Location in value chain [ESRS 2.48a]	Sub-topic or related sub-topic [ESRS 2.48h]
We guarantee equal pay for work of equal value in the geographical regions where we operate.	Positive impact	--	Own operations	Gender equality and equal pay for work of equal value
A rejuvenation programme is currently running in Navigator, which Employees are able to join as from the age of 57, cutting short their time in the Organisation. For these Employees, the programme offers the advantage of financial conditions more advantageous that their current employment situation, enabling them to step back from work before the legal retirement age.	Positive impact	--	Own operations	Diversity
A rejuvenation programme is currently running in Navigator, which Employees are able to join as from the age of 57, cutting short their time in the Organisation. This programme has benefits for the Company, as it enables it to "renew" its workforce, with all the resulting advantages (e.g. absenteeism).	Opportunity	Medium term - From reporting year and up to 5 years	Own operations	Diversity
Working environments where genders and age ranges are under-represented are less inclusive and equitable, taking a toll on innovation and the sense of belonging.	Negative impact	--	Own operations	Diversity
Work-related accidents or occupational diseases leading to fatalities, injuries or other pathologies.	Negative impact	--	Own operations	Health and safety
Non-compliance with occupational safety rules and procedures has a negative effect on the health and safety of Workers.	Negative impact	--	Own operations	Health and safety
Implementing programmes and policies that promote a safe working environment, including training in safety, ergonomics and well-being, tends to improve people's satisfaction and productivity and have a positive influence on the Company's reputation, as well as reducing the number of work-related accidents.	Opportunity	Short term - Reporting year	Own operations	Health and safety

NB: the material impacts identified are actual, and so there is no associated time horizon.

Human capital is a priority for Navigator. We have invested in it continuously and in a structured way, so that our Employees can evolve, progress and enjoy a sense of self-realisation. The importance of **Talent Management** is reflected in the direct oversight by The Navigator Company's CEO, whilst the **Human Resources** sector is the responsibility of a member of the Executive Committee. This structure points to the strategic role of our Employees for the sustainability and future of our business, and also the social and economic impact generated on the local Communities where we operate (Chap. 5.3.3).

Our **people management approach** is based on stable employment, rewarding merit, growth (internal advancement and continuous skills development) and on promoting safe working environments for some 4,000 Employees. Navigator seeks to be a **top employer**, investing in workforce satisfaction, which is reflected in greater productivity and improved capacity to attract young talent and to retain skilled professionals, positively influencing the Company's reputation. [S1.14d | S1.13b]

Navigator's **manpower** comprises Employees contracted by the Group and by non Employees (temporary workers). The latter sub-divide into two groups: temporary labour agency workers and independent workers, providing services or supplying manpower to Navigator on express contractual terms. The number of independent workers is currently small, meaning they were not considered in this disclosure of results. [S1.14a]

We invest actively in promoting the safety, health and welfare of our Employees, acknowledging the importance of these dimensions to the quality of life and productivity. Mindful of the impacts of our operations, including the possibility of accident at work and occupational diseases, we have made a firm commitment to creating and safe and healthy working environment. In addition to potentially impacting our Employees and their families, such incidents can also compromise the attainment of our goals in the field of health and safety. We accordingly work to promote an Occupational Health and Safety (OHS) culture, designed to bring a sustained impact in minimising risks, reducing the occurrence of accident at work and eradicating occupational diseases. Conducting our business responsibly also enables us to cut costs, mitigate risks for people, value chain Workers (Chap. 5.3.2), Communities (Chap. 5.3.3) and the environment (Chap. 5.2) – especially in the context of our industrial units and forestry operations - and to ensure the preservation of facilities and plant. [S1.13a | S1.14d]

The material negative impacts identified include both systemic impacts and individual incidents. Shift work and under-representation of gender groups and age ranges or examples of systemic impacts which can then affect the quality of life and the physical and mental health of Employees working shifts, and create a less inclusive and equitable environment, with damaging effects on innovation and the sense of belonging, and consequences for the organisational culture and productivity. In addition, there are occasional incidents, such as accident at work caused, for example, by non-compliance with safety rules, which can compromise the health and safety of Employees. [S1.14b]

On the other hand, Navigator has adopted a range of practices that generate positive impacts on the **well-being and development of its Workforce**, in particular of its Employees in the various regions where it operates. [S1.14c] **Attractive salaries and benefits**, together with **continuous training and respect for the work-life balance**, contribute to the satisfaction, growth and well-being of the Workforce. **Social dialogue and collective bargaining** promote better working conditions and encourage active Workforce involvement and participation in the organisation. The rejuvenation programme offers economic advantages for older staff, and reflects Navigator's commitment to its Workforce. In addition, **job security**, when workers are switched from temporary to permanent contracts, adds to Employee stability and satisfaction, and is aligned with our mission of providing a stable and secure career path. Lastly, **equal pay for work of equal value** demonstrates our commitment to equity and fairness at work, strengthening Navigator's culture of inclusion. Our workforce is predominantly male, reflecting a gender imbalance historically influenced by the physical demands of jobs in forestry and manufacturing. Acknowledging this challenge, we have embraced the responsibility of promoting a culture of fairness, committing ourselves to valuing **diversity, gender equity and inclusion**, effectively ensuring equal opportunities in employment. [S1.13a | S1.14d]

After an internal assessment conducted by Navigator, no Employees were identified with specific characteristics or in a particular setting who, in doing their jobs, were exposed to added risk of damage, in accordance with the impacts and opportunities identified in the materiality assessment. [S1.15] On the other hand, attention is drawn to the rejuvenation programme, which is measure aimed at a specific group within the workforce (older Employees), making it possible to optimise Navigator's human resources management. [S1.16]

We are mindful of our role in building a fairer and more sustainable society, conducting our operations and activities on the basis of a responsible business culture, founded on ethical principles. We therefore reaffirm our commitment to **respect for Human Rights** in all our operations and throughout the value chain, ensuring that we promote decent workplaces free of any form of exploitation, as set out in the commitments in our Human Rights Policy. In this context, the Group has not identified, in its own operations, any countries or geographical regions with an added risk of forced, compulsory or child labour. [S1.14f | S1.14g]

As a company, we accept our responsibility to act as a catalyst for change and to have a positive influence on society, promoting a positive and lasting impact. The material impacts and opportunities identified apply to all our Employees, but may vary depending on the location and country. [S1.14] It should also be pointed out that the material impacts on our human capital do not result from our transition plans for reducing negative environmental impacts or for climate neutrality, but rather from our ongoing commitment to valuing people and creating safe and fair working conditions.. [S1.14e]

5.3.1.2. Management of impacts, risks and opportunities

5.3.1.2.1. Policies related to own workforce (S1-1, MDR- P)

We accept the importance of respect for Human and employment rights and are committed to valuing diversity, gender equity and inclusion as an integral part of our wider business operations. These concerns are reflected in our **Code of Ethics and Good Conduct**, the **Human Rights Policy**, the **Equality Plans in Portugal and Spain**, and the future **Remuneration Policy**. In addition, with regard to promoting occupational health and safety, we may point to the **Major Accident Prevention Policy (MAPP)**, aligned with the aims set out in the **Management Systems Policy**. [S1.20 | S1.23 | S1.24a | S1.24c | S1.24d] Whenever possible, we also seek to adjust and align practices in the different geographical regions where we operate. ensuring practices are aligned with our principles and strategic goals.

The Code of Ethics and Good Conduct reflects the values and commitments that guide the conduct of our business, promoting integrity, transparency and responsibility. This code guarantee decent working conditions for Employees and expressly prohibits child and forced labour, in line with the ILO Conventions and the Universal Declaration of Human Rights. [ESRS 2.65d | S1.20 | S1.21 | S1.22] It is complemented by the Code of Conduct for Suppliers (Chap. 5.4.1) and by Portucel Moçambique's Internal Regulations and Good Practice Guides for Temporary Workers and Service Providers. [S1.AR13]

With regard to **non-discrimination**, the Code of Ethics and Good Conduct lays down that Employees must not act in a discriminatory way in relation to Employees or any persons on the basis of race, religion, sex, sexual orientation, descent, age, language, territory of origin, political or ideological convictions, economic situation, social context or terms of employment, and must foster respect for human dignity as one of the fundamental principles of the culture and policy followed by Navigator. [S1.24b | S1.24c] In addition, this document is complemented by the **Code of Good Conduct for Preventing and Combating Workplace Harassment**. [S1.24a]

For Navigator, respect for human dignity as a fundamental right is an essential question of ethics and one of the foundational principles of our Group's culture and policy. We believe in our role in building a better society, by conducting our operations and activities on the basis of a responsible corporate culture. Our **Human Rights Policy** accordingly envisages measures to ensure respect for the human and employment rights of all those who have dealings with the Navigator Group. We are also committed to promoting measures to identify Navigator’s main impacts and potential risks in the field of Human Rights, in particular through due diligence processes, and to taking appropriate steps to prevent, mitigate and remedy and situations of non-conformity. In order to assure that these commitments are met, the Policy establishes a matrix of responsibilities associated with its governance model, determining the specific responsibilities for each sector, department and committee involved, and ensuring clear and efficient management of the activities provided for in the policy. [S1.20 | S1.21 | S1.24d]

We have accepted a commitment to respect Human Rights in our value chain operations, in keeping with the principles set out in the International Bill of Human Rights, in the OECD Guidelines for Multinational Enterprises, in the Fundamental Conventions of

the International Labour Organisation and in the United Nations Guiding Principles on Business and Human Rights, and we are signatories of the English and Portuguese versions of the CEO Guide to Human Rights, published by the WBCSD and BCSD Portugal, respectively, in conjunction with other companies in Portugal and around the world. [S1.20 | S1.21 | S1.22 | S1.24c]

The documents framing our responsible conduct and the commitments accepted by the Navigator Group recognise an extensive list of Human Rights, such as freedom, equality and dignity; non-discrimination and non-coercion; freedom of thought, conscience and religion; prohibition of slavery and child labour; occupational health and safety; recognition of the freedom of association and collective bargaining; equal opportunities and gender equality. [S1.24a | S1.24c]

In the areas where forestry operations are conducted in Mozambique, there are Community Liaison Officers (Chap. 5.3.3) who also assess issues related to Human Rights, such as the existence of child labour.

Due to the existence of a minority shareholder - International Finance Corporation (IFC) –, operations in Mozambique are governed by this institution's Performance Standards (PS), in particular PS2: Labour and Working Conditions and PS4: Community Health, Safety, and Security. [S1.20 | S1.21]

Our Human Rights Policy, in line with the principles established in the Code of Ethics and Conduct, expressly prohibits **child labour and forced labour**, and other forms of **modern slavery** (including human trafficking) We are accordingly committed to not employing labour under such conditions or tolerating labour exploitation practices. [S1.22] The policy also sets out our commitment to valuing **diversity, gender equity and inclusion**, as a way of ensuing equal opportunities in employment. This commitment is extended to Migrant workers and to Disabled persons, ensuring an absolute prohibition of any discriminatory conduct in relation to Employees and other Workers (and also in relation to local Communities – Chap. 5.3.3). [S1.24a | S1.24b | S1.24c]

In addition to this, Navigator Tissue UK publishes each year its Modern Slavery and Human Trafficking Statement under the Modern Slavery Act 2015, pointing to the Company's commitment to preventing risks relating to modern slavery and human trafficking in its own operations, in particular in situations associated with the use of temporary labour. The statement underlines the company's principles in the field of Human Rights and responsible labour practices, promoting a safe, ethical and transparent working environment. [S1.22]

With a view to correct implementation of the fundamental instruments referred to above, we believe that the first step to preventing and avoiding situations of discrimination is to train and raise awareness of our Employees. To this end, we offer all Employees a range of training options on Ethics and Integrity, in order to underline the importance of the rules sets out in our internal Human Rights instruments. [S1.24d]

In connection with **Diversity, Equity and Inclusion (DEI)**, it is also important to stress that we have implemented a governance model which identifies a manager and a committee, reporting to the board of directors, supported by a broad multidisciplinary task force, which works to create a more robust assessment model and to propose and implement internal initiatives and projects in this area. In this model, the **taskforce for Equality** has been set up in to consider diversity in terms of the gender, age, nationality and professional experience, with members representing the departments most directly involved in designing and following through our strategy in this area. [S1.24a] In order to achieve greater equality, in its various dimensions, to strengthen the Group's practices in this area, and also to press ahead with policies to facilitate a better work-life balance, several measures envisaged in the Equality Plan 2025 were implemented and the **Equality Plan 2026** was drawn up. [S1.24a]

Document	Equality Plan, Portugal
Key content and goals [ESRS 2.65a]	Its main aim is to promote and ensure equitable conditions within the Company, so as to eliminate any type of discrimination, especially with regard to gender. It also works to create an inclusive environment, which recognises and values diversity, ensuring equal opportunities for all Employees.

Document	Equality Plan, Portugal
Scope [ESRS 2.65b]	Aimed at own operations and with an impact on Employees, in Portugal.
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	
Availability [ESRS 2.65f]	This document is shared online with all Employees.

Navigator Tissue Ejea has a separate Equality Plan from that applicable to operations in Portugal, ensuring compliance with the legal obligations in Spain on issues of Diversity, Equity and Inclusion.

In the United Kingdom, we have stepped up our commitment in this area, through implementation of practices aligned with the Equality Act 2010, ensuring not only compliance with the law, but also the attainment of high standards of ethics and integrity, including concrete action to narrow the pay gap, as detailed in the Navigator Tissue UK's Gender Pay Gap Report 2025. This report points to transparency and an ongoing commitment to promoting fairness, through measures such as career development programmes, inclusive recruitment policies and initiatives to boost the representation of women in leadership roles.

The Company is currently developing its Remuneration Policy, which is due to be approved during 2026.

This document will be a key instrument to steering consistent remuneration policies, aligned with the organisational strategy and with valuing people, adding to transparency and the internal coherence of the remuneration management model.

The remuneration framework is based on a structured model of roles and organisational groups applicable to Management and Technical Staff, and on a Careers Plan for Technical Operatives, ensuring internal fairness, clarity in professional development and coherence between responsibilities, skills and framework levels. Professional advancement is based on the performance assessment, on skills acquisition and evolution of the responsibility level, seeking to build Employee loyalty and continuous development of teams.

Under the new **Careers Plan for Technical Operatives**, training programmes have been set up, together with a new logging and monitoring system, which can be directly tracked by management. This model ensures that teams are continuously acquiring skills and developing their professional potential, on the basis of a series of factors set out in the plan. This approach has been designed in conjunction with the Human Resources Department (careers plan) and with the Compensation and Benefits sector (pay policy), and has been approved by the Executive Committee. It is also aligned with the OECD Guidelines for Multinational Enterprises, the Fundamental Conventions of the International Labour Organisation and the United Nations Guiding Principles on Business and Human Rights.

Under the Job Family Model, in which roles are organised into functional families, an Internal Mobility and Career Pathway Model has been set up for Employees, setting out the internal mobility policy, including the respective requirements and types of mobility. Implementing this model has entailed developing a Mobility Model Handbook, a booklet on occupational pathways and mobility, as part of the Employee's Guide, structuring a catalogue of Technical and Functional Skills and designing 75 model occupational pathways to serve as examples. In implementing this new model, we organised communication sessions in the field for the Employees affected.

Navigator has an **Occupational Health and Safety Management System (OHSMS)** governed by ISO 45001 and applying to internal and external Employees. We are committed to providing a safe and healthy working environment, preventing injuries and

occupational diseases, in line with the ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. This commitment is put into operation by [S1.23]:

- Identifying and monitoring work-related risks and implementing preventive measures.
- Continuous training of Employees and Partners, promoting a safety culture.
- Clear definition of responsibilities and allocation of adequate resources for ensuring compliance with safety standards and goals.
- Implementation, monitoring and assessment of practices which promote occupational health and safety, increasing the protection for direct and indirect Workers.

This system includes:

1) Continuous risk assessment, considering the dynamic of operations and the introduction of new technologies.
2) Employee consultation and involvement, encouraging their active participation in identifying improvements.
3) Management of incidents and accidents, including investigation, reporting and adoption of corrective measures to avoid recurrence.

Our Management Systems Policy commits us to creating shared value with society, promoting quality, sustainability, safety and innovation in our operations, and ensuring compliance with legal and ethical obligations, from a perspective of continuous improvement and sustainable development. We can point to the following commitments with an impact on our Employees:

- To provide safe and healthy working conditions in order to prevent work-related injuries and diseases, adhering to the principles of continuous improvement;
- To embrace social responsibility practices, in particular for the benefit of employees and communities in the areas around our industrial plants and forestry holdings;
- To promote workforce consultation and participation, as well as personal and professional development for our employees, encouraging initiative, innovation, productivity and a commitment to achieving our goals.

The **Major Accident Prevention Policy (MAPP)** addresses the management risks relating to handling of hazardous substances, and ensures [S1.23]:

- Protection of human health and the environment, through robust hazard monitoring and management systems.
- A fully operational Internal Emergency Plan, including coordination with the external bodies, in order to ensure an effective response to hazard situations.
- Periodic review of the management system in order to incorporate lessons learned and maintain effectiveness.

Document	Major Accident Prevention Policy
Key content and goals [ESRS 2.65a]	This policy highlights our commitment to preventing major accidents involving hazardous substances, promoting continuous improvement, compliance with legal requirements, safety of operations, training for Stakeholders and protection of human and environmental health.
Scope [ESRS 2.65b]	Applies to our own industrial operations, in Portugal and Spain, and has an impact on Employees, other Stakeholders (essential Service providers and external Employees) and Local Communities.
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee

Document	Major Accident Prevention Policy
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	
Availability [ESRS 2.65f]	This document is communicated to all Employees, Business partners and Stakeholders through the intranet and online. It is also affixed in workplaces.
References over the course of the non-financial statement	• S2 – Workers in the value chain (Chap. 5.3.2)

These instruments are interconnected and underpin our commitment to continuous improvement, the health and safety of our Employees and the sustainability of our operations. [S1.23] We can also point to our **"Mission Zero" Health and Safety Strategy**, which has involved identifying and implementing a range of actions (see Section S1-4). By incorporating these policies and systems, we promote a holistic approach to occupational health and safety, aligned with our values of sustainability, excellence and innovation. This enables us to ensure compliance with legal and voluntary obligations, ensuring the well-being of our Employees and protecting Communities and the environment. [S1.23]

It should be noted that we are currently developing a **Health and Welfare Policy** [ESRS 2.62], which will lay down guidelines for improving Employee welfare. This policy will include guidelines for modernising the Medical Units and continuous improvement of our Health Services, adopting of inclusive and personalised care, promotion of Employee consultation and involvement in setting health and welfare priorities, and also implementation of prevention and emergency response measures.

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Presentation of Code of Ethics and Good Conduct (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.4.1
- Presentation of Human Rights Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.4.1
- Presentation of Management Systems Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.5

5.3.1.2.2. Processes for engaging with own workers and workers' representatives about impacts (S1-2)

Open and transparent social dialogue has long been a concern for Navigator, and this has been pursued further in recent years by promoting regular communication with the different Workers' representative bodies, in order to establish a closer relationship with the workforce, and to achieve the aims established by both sides in the employment relationship. [S1.27a] This has not only resulted in greater closeness between these bodies and Navigator's different operational sectors and the Human Resources (HR) Department, but it has also encouraged direct dialogue with the Executive Committee itself, as well as the director responsible for HR. [S1.27]

An example of this type of initiative has been the Industrial Relations Forum, involving the executive directors and the organisations representing workers at all of Navigator's sites and business areas, together with all the Industrial Directors, the Human Resources Department, the Legal Services Department and the Safety Sector. This forum enables us to share the outlook for the different business areas, for current and future challenges and for global developments. Employment issues of interest to Workers are debated.

Dialogue was an important feature of the industrial negotiation procedures which resulted in a two-year agreement for 2022/2023 and its renegotiation for 2024/2025. At present, the Company is negotiating with the workers' representative organisations (WROs) on the agreements to apply in 2026. [S1.27]

In addition to establishing custom-made negotiated agreements, changes were also made to the following collective bargaining instruments [S1.27a]:

- Company Agreement (The Navigator Company) with Fetese (2022/2023 and 2024/2025);
- Company Agreement (The Navigator Company) with Fiequimetal (2022/2023);
- Collective Agreement reached by Navigator Tissue Ródão and Navigator Tissue Aveiro with the union organisations Fiequimetal and Fetese (period 2022/2023).

In relation to Spain, after a period necessarily focused on integration in Navigator, social dialogue has been fruitfully established with the Workforce, and culminated in conclusion of an agreement governing employment terms at Navigator Tissue Ejea, over the period 2025 to 2027.

Regular meetings are held with WROs, on a monthly or bi-monthly basis, at all industrial units, organised by the mill managers and the Human Resources Department. These meetings address issues related to business developments, the safety of facilities and persons, as well as a range of human resources issues, such as career plans, working hours, welfare benefits, employment negotiations and others. [S1.27b]

In Mozambique, annual meetings are held with Workers and Service providers, at which we report on progress on the project and listen to the views of Employees. In addition to these general meetings, the Company also organises events with second-line management, for the purpose of inclusive discussion of topics relevant to the project. [S1.27a] Responsibility for ensuring this dialogue lies with the Managing Director. [S1.27c]

These meetings have continued. However, it was not possible to hold these meetings in 2025 due to the political situation in the country, with the contested results of local and presidential elections, causing Mozambique to be placed in a state of alert, with travel restrictions, due to demonstrations held in several regions of the country.

Navigator has complied with its legal requirements concerning specific measures to be taken to learn about the perspectives of more vulnerable and/or marginalised workers. [S1.28]

In particular, the topic of disabled Workers is being given attention as part of a project currently in development. [S1.28]

Responses gathered in Worker consultations on OHS are analysed and feed into the action plan for the following year. A survey of near-accidents was conducted in 2025, in order to understand why these incidents are not reported. The unsafe conditions reported are monitored weekly on local safety committees until they are resolved, and information is also consolidated monthly and shared with the managers of the respective areas for monitoring.

The effectiveness of the dialogue can be assessed from the voluntary turnover rate, one of the ways of measuring the satisfaction of Employees with their experience of work in the Organisation. [S1.27e]

Complementing the social dialogue with WROs, the GROWING project has continued, with an action plan resulting from workers' suggestions and the findings of the Organisational Climate Survey.

In addition, we provide a Whistleblowing Channel for reporting any type of irregularity and/or infraction, and we conduct Worker consultations and organisational climate surveys (see following section). [S1.27]

5.3.1.2.3. Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

In conducting our business and in our interactions with all our Stakeholders, we believe it is fundamental to promote a culture based on transparency and trust, to have in place procedures that facilitate the identification, reporting and investigation of

concerns related to wrongdoing or breaches of the Code of Ethics and Good Conduct or other internal standards. [S1.32a | S1.32d] With this aim, we have implemented a Whistleblowing Channel (Chap. 5.4.1) and the following complementary channels, which enable our Employees to voice their concerns or needs [S1.32b]:

- **Organisational Climate Survey**, conducted every 2 years, covering all Employees; the 2025 survey included Employees at Ejea and in the United Kingdom.
- **GROWING Project**, designed to boost our people's "commitment and sense of achievement", with a website and the possibility of interaction with several content items, including space for suggestions, feedback or comments.
- **Cross-group communication channels and documents** applicable in Portugal, for improving the response to Employees' questions and concerns, in particular

    1) Employee's Guide, with a summary of the main policies and HR procedures in place, distributed on paper to all Employees, with an e-book version available on the Intranet;

    2) HResolve Portal, with customisation of interlocutors for topics where Employees have questions, for a faster, more agile response, allowing for KPI monitoring for continuous improvement.

    3) Launch of a chatbot to answer Employee's questions.

There is also a specific procedure for Employees who disagree with the findings of their **Performance Assessment**. A complaint is filed on the HEesolve Portal or by email, within 15 days of receiving the assessment, and the case is examined by the Performance and Careers (P&C) sector in partnership with the Talent Business Partner, Senior Management and the Director of the area in question. Navigator undertakes to reply to the Employee in writing, and whenever justified changes are made to the assessment. This appeal procedure is available for all Employees under the Performance Management Model, which does not include the United Kingdom. In the case of Navigator Tissue Ejea, only Technical and Management Staff are covered. [S1.32c | S1.32e]

In Portugal we conduct two annual Navigator Worker consultations on occupational health and safety issues. An anonymous online questionnaire is used to identify strong points and development needs in Navigator's OHS sector. The first consultation listens to both internal and external Workers, whilst the second is solely for internal Workers. [S1.32c | S1.32e]

In Mozambique, **complaint boxes** have been installed at strategic locations in the offices, so that Employees are able to submit their complaints safely and confidentiality. In the case of casual Workers in the field., complaints can be submitted through the Communication Officers or the Community Liaison Officers (through the complaints management procedures for Local Communities, insofar as Workers are persons living in those communities), and are then passed on to the Company, by the Communication Officers, for analysis and resolution. [S1.AR30 | S1.32c]

Navigator regards Employee training as essential in order for these policy documents to be correctly implemented, with a view to promoting a Compliance culture based on ethics and integrity. To this end we provide **training** in compliance topics, in particular Whistleblowing and Internal Policies. [S1.33]

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Further information on the tracking and monitoring of questions raised and addressed and ensuring the effectiveness of the Whistleblowing Channel (S1.32e): Chap. 5.4.1.

5.3.1.2.4. Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4, MDR-A)

Navigator is firmly commitment to its Employees' advancement and welfare, mindful that responsible management of its own manpower is essential for ensuring a safe, inclusive and productive working environment.

We engage with our labour force, both directly and indirectly, through a number of procedures that help to guide our decision-making. In the field of **Occupational Health and Safety**, we consult all our Employees using an online survey, conducted twice a year. They survey findings are shared transparently, permitting everyone to access the information and learn about the measures designed on the basis of the responses received. [S1.39]

We also encourage collaboration between Workers' representative organisations, the different operational sectors and Navigator's Human Resources Department. Direct dialogue has also been promoted with the Executive Committee, including the director responsible for Human Resources. [S1.39]

We run ongoing initiatives to **strengthen the organisational culture, to empower people, improve working conditions and promote safety and the home-life balance** enjoyed by our Employees. In this way we ensure that steps are taken to prevent, minimise or correct negative material impacts on our own manpower, whilst also promoting positive impacts and opportunities identified as material for Navigator. [S1.38a | S1.38c | S1.40b]

The Company ensures that its practices neither cause nor contribute to material negative impacts on its own workforce, through policies and measures that guarantee a healthy, safe and inclusive working environment. We ensure that working conditions comply with legal requirements and best practices, promoting Employee welfare and preventing any form of exploitation or discrimination. [S1.41]

At the same time, by setting targets and analysing the related metrics (see "Targets and metrics" section), the Group is able to monitor its performance and the effectiveness of the steps taken, meaning it can adjust the strategies adopted. [S1.38d]

The main initiatives implemented during 2025 included action taken and in progress under the **GROWING Project, Health Month, Leadership Training in Safety and the Mission Zero Strategy**. [S1.37 | ESRS 2.68]

One of the leading initiatives in Mozambique in 2025 was the training in first aid provided to a number of technical operatives; this is especially relevant because we operate in geographical area significantly distant from hospital units. The training was provided by the Portuguese Red Cross and was designed to boost the immediate response capacity of our teams in emergency situations, helping to improve safetyu conditions in the field. [S1.37 | ESRS 2.68]

Main actions:	***Status***	**Scope of action**	**Time horizon**	**Results**
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	**[ESRS 2.68a | ESRS 2.68d | ESRS 2.68e]**
Diversity, equity and inclusion				
DEI Project	Executed and planned	Own operations, in all geographical regions	Started in final quarter 2024, ongoing in 2026	Two questionnaires were designed to support the DEI Assessment, one of which to characterise the population to be listened to, and another to assess perceptions.
Implementation of measures envisaged in the 2025 Equality Plan	Executed and planned	Own operations, in Portugal	Annual, with measurements	As described in the 2026 Equality Plan, implementation of the 2025 Equality Plan involved developing and planning

Main actions:	*Status*	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	**[ESRS 2.68a | ESRS 2.68d | ESRS 2.68e]**
			in different time horizons.	measures relating to the Company's strategy, mission and value, equal access to employment, training, equality in working conditions, protection for parents, work-life balance and prevention of workplace harassment.
Training and skills development				
Training in first aid, provided by Red Cross	Executed	Technical operatives and Individual service providers (ISPs), in Mozambique	2025	This training was provided to 35 workers in different operational sectors. The training made it possible to significantly increase emergency response coverage, considering that the Company operates at widely dispersed geographical locations. There are now Employees with training at different working locations, reducing emergency response times. As a result, the company now has staff able to intervene immediately and safely, providing the first aid needed to keep victims in a stable situation, prevent their injuries from worsening and care for them, until specialist response units arrive. This initiative directly contributes to protecting life, reducing the severity of work-related accidents and strengthening a culture of prevention, in line with the Organisation's principles of social sustainability and corporate responsibility.
Training Pathway with 3 training levels in the field of Artificial Intelligence and provision of playlists in the Selflearning hub	Executed and planned	Own operations, in Portugal	Started in 2025, ongoing	Skills development in the field of Artificial Intelligence. Training in Artificial Intelligence was provided to 461 persons in 2025.
Compliance training relaunched	Executed and planned	Own operations, in Portugal	Ongoing action	Ensure that Employees who completed their compliance training more than 2 years ago complement and update their skills in these areas.
Sustainability Highlights	Executed and planned	Own operations and downstream, in Portugal	Started in 2025, ongoing	An area was created in the Intranet, in the Sustainability Hub tab, for periodic provision of documents providing a simple, accessible and appealing overview of sustainability topics. Provision of seven documents in 2025. These documents are designed to support business areas and are mostly based on content selected from the Annual Report.

Main actions:	*Status*	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	**[ESRS 2.68a | ESRS 2.68d | ESRS 2.68e]**
				The aim is to provide information which is easy to consult and use, making for clearer and more practical communication on the Organisation's main sustainability topics.
DEI training	Executed and planned	Own operations, in all geographical regions	Started in final quarter 2024, ongoing in 2026	Work started on developing syllabus content to be included in training modules.
Training Programme for Future Operatives	Executed and planned	Own operations, in Portugal	Started in 2025, ongoing	Training programmes in partnership with IEFP, for secondary school and vocational education students. A new model consisting of seven months of study was launched in 2025: five months of classroom training, at IEFP, and two hands-on months at Navigator's facilities, in order to prepare future production operatives. At the end of the course, students who pass have the chance to join Navigator's workforce.
"CRESCER" (GROWING)Project - Updating of Employee's Guide with two new materials: Training Catalogue and Occupational Pathways and Mobility Booklet	Executed	Own operations, in Portugal	2025	Development of materials in the Employee's Guide in order to address topics relating to development and advancement of our people. Design of a Training Catalogue, illustrating the training offered across the Group, in order to boost the quality of Individual Development Plans. Dissemination of the Occupational Pathways and Mobility Booklet, which explains how Employees can progress in Navigator, what pathways they can follow and what their role is in this journey. This document includes real-life examples, to illustrate the possibilities for growth.
Adequate wages				
Training on pay policies, bonuses and benchmarking	Executed	Own operations, in Portugal	2025	Training for all Employees on the remuneration policies in place, including information on bonuses and referrals of new Employees;
Improved pay conditions for Employees, through creation of 2 referrals programmes: - Referrals programme (as part of "CRESCER" (GROWING) project; - Land Referrals Programme.	Executed	Own operations, in Portugal, except for Land Referrals Programme, which applies to all Employees	2024 and 2025	Creation of the Referrals Programmes, under which Employees can indicate persons outside the organisation, in order to speed up recruitment processes, drawing on their networks of contacts and rewarding them when appropriate to the job and the Organisation. Creation of Land Referrals Programme - Inner Strength, which recognises and rewards the initiative of Employees in indicating or identifying properties for

Main actions:	*Status*	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	**[ESRS 2.68a | ESRS 2.68d | ESRS 2.68e]**
				Navigator, and their contributing to increasing raw material in the forestry sector.
Creation of Housing programme - financial support	Executed	Own operations, in Portugal	2024 and 2025	New programme designed to fund part of the expense incurred by Employees in long-term rental of buying their own home, subject to specific regulations.
Cross-group action				
"CRESCER" (GROWING)Project - Programme for developing organisational culture	Executed and planned	Own operations, at all units, except Navigator Tissue UK	Started in 2022, ongoing	The project has helped established and strengthen relations between Employees. This is considered a success factor in retaining people in the Organisation and is designed to strengthen and empower our Leaders. It also helps to encourage a sense of belonging and Employee self-realisation.
GROWING Project - Communication of new initiatives and consolidation of initiatives already implemented	Executed and planned	Own operations, in Portugal	Started in 2025, ongoing	Executed through several communication tools (3 newsletters published in 2025) and with training in the field, aimed at Employees: more than 400 Technical and Management Staff and approximately 1900 Technical Operatives reached. Initiatives aimed at leaders are in progress.
Health, safety and well-being				
Mission Zero - Action 1: Development of initiatives, focussed on the fields of mental health, nutrition and physiotherapy, to provide tools that help the Employees in question to improve their quality of life and adapt to shift working	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2022, ongoing	Personalised support in mental health, nutrition and physiotherapy Results: Improved quality of life and better adaptation to demands of work, with particular attention to shift workers. Building skills for adapting to work challenges Results: Reduction in complaints relating to fatigue and muscle issues, improving productivity and well-being.
Mission Zero - Action 2: dissemination of hobbies and free time activities	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2023, ongoing	Investigation and immediate response to accidents Results: Improved safety procedures and increased Employee confidence in Navigator's response.
Mission Zero - Action 3: Implementation of measures to reduce the occurrence of work-	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2022, ongoing	Direct involvement of workers in identifying and resolving problems Results: Implementation of solutions aligned with the real needs of

Main actions:	*Status*	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	**[ESRS 2.68a | ESRS 2.68d | ESRS 2.68e]**
related accidents or occupational diseases				Employees, building the sense of belonging and of being valued. Recognition and incentives for safe practices Results: Improved motivation and commitment to safety policies, contributing to a safer organisational culture. Number of Employees recognised: 177 Number of work-related accidents leading to sick leave: 47 (2024) vs. 32 (2025) Training to avoid future impacts Total participation: 12 710 OVERALL results from all actions Significant reduction in incidents over period, with direct impact from the target of Frequency index=2.8 Sick leave avoided: 242 | Total recoveries: 522 | Partial recoveries: 124
Mission Zero - Action 4: Implementation of a systems of penalties and rewards related top compliance with occupational safety rules and procedures	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2023, ongoing	
Mission Zero - Action 5: Worker empowerment	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2023, ongoing	
Mission Zero - Action 6: implementation of programmes and policies for promoting a safe working environment	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2021, ongoing	
Extension of implementation of Mission Zero Strategy to all industrial and forestry units in Iberia	Planned	Own operations, Iberia (Industrial and Forestry)	2026	Extension of the Mission Zero strategy is designed to improve the physical and mental health of Employees, promoting their welfare and safety at work. A reduction in accidents and occupational diseases is anticipated, together with improved compliance with safety rules and procedures. In addition, the initiative contributes to training and skills development, creating a safer and better informed working environment.
Training in Safety Leadership	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2021, ongoing	Training for Leaders in Safety Leadership tools is designed to equip these professionals for increasingly efficient management, and reached 302 Leaders in 2025.

Main actions:	***Status***	**Scope of action**	**Time horizon**	**Results**
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	**[ESRS 2.68a | ESRS 2.68d | ESRS 2.68e]**
Top 5, new prevention indicator	Executed and planned	Own operations, in Portugal (Industrial and Forestry)	Started in 2025, ongoing	More than 200 high risk activities identified at industrial units in Portugal, with a view to reducing risks with engineering barriers, training, procedures and other approaches.
Health Month	Executed and planned	Own operations, in Portugal	Started in 2018, ongoing	Health Month was devoted to the topic of Physical Activity. It involved 3 webinars and 8 practical activities at the various sites, reaching a total of 181 Employees. There was also a Navigator run for families and Employees. The event took place at the Jamor Stadium, and brought together 90 Employees and family members, at an event that grew out of an idea shared by the Employees themselves. As part of Health Month, it sought to promote well-being and team spirit, and to offer a relaxed opportunity to socialise.

The action taken under the "CRESCER" (GROWING) Project and the Mission Zero strategy has required allocation of significant financial resources and also human resources for execution. [ESRS 2.69a | S1.43]

A total of 514 thousand euros (OpEx) was allocated to the GROWING Project in 2025. Implementation of the project involved and internal team and more than 150 Employees, at different hierarchical levels in the organisation. [ESRS 2.69a | S1.43]

Implementation of Mission Zero initiatives involved allocation in 2025 of 4.01 million euros in capital expenditure (CapEx) and 2.27 million euros in operating expenditure (OpEx). For 2026, the planned allocations are 4.1 million euros in CapEx and 2.19 million euros in OpEx. [ESRS 2.69 a | S1.43] In addition to the financial resources allocated, there were also 19 Internal Employees and 23 External Employees (including health teams) who helped execute these initiatives. [ESRS 2.69a | S1.43]

Financial resources	Unit	Value
Current CapEx [ESRS 2.69b]	M€	Mission Zero: 4.01
Current OpEx [ESRS 2.69b]	M€	Growing Project: 0.51 Mission Zero: 2.27
Future CapEx [ESRS 2.69c]	M€	Mission Zero: 4.1
Future OpEx [ESRS 2.69c]	M€	Mission Zero: 2.19

The following information is incorporated by reference to other parts of the Annual Report:

- Further information on the relationship between the current financial resources allocated to these actions or action plans and the most significant figures in the financial statements (ESRS 2.69b): Nos. 2.3, 3.2, 3.3, 3.6 of the Notes to the Financial Statements.

Talent management and development of human capital

In line with its purpose, "It is people, their quality of life and the future of the planet that inspire and motivate us", The Navigator Company has set up an internal project geared to mobilising change and transforming the organisation across the Group – **the "CRESCER" (GROWING) Project**. [ESRS 2.68a] Under the slogan "So that all Navigator's people, committed and fulfilled, can lead the organisation's future", the GROWING Project has 3 goals:

1) Encouraging a sense of belonging;

2) Improving the ways we work;

3) Preparing current and future leaders.

At the needs analysis phase, conducted in 2023, we organised focus group sessions with more than 200 Employees, which gave rise to a roadmap of 29 initiatives, implementation of which is currently in progress. Teams have been given autonomy to implement solutions, creating a working dynamic that mobilises Employees, bringing together individuals from different sectors, functions, generations and geographical regions. [ESRS 2.68a] As part of the GROWING Project, the following measures have been implemented with a view to preventing, minimising or correcting material negative impacts on our own workforce [S1.38a]:

- Leading with Purpose Handbook – We have continued to distribute the Handbook to new Leaders, detailing the specific behaviour expected of navigator's leaders.
- Recognition Programme - We have continued to encourage recognition and rewards for the behaviour to be fostered in the Organisation.
- Employee's Guide - We continue to distribute the Employee's Guide to new Employees. The Guide provides an overview of human resources policies, helping new Employees to integrate and to answer their questions. The Guide has been updated with two new chapters: Training Catalogue and Occupational Pathways and Mobility Booklet.
- New HResolve portal and Chatbot – Complementing the Employee's Guide, we have provided the HResolve portal and Chatbot, helping to resolve requests and incidents concerning the Human Resources and Talent Management teams.
- Referrals Programme - So that everyone can contribute to building teams and to the future of the Organisation.
- Communication and training in several support tools - Leader's *Dashboard*, *Task Master* to help prioritise tasks, *People Plan*, *Quick Guides* on a range of issues, and other materials.

- Digital Forum - Continuing the work of the forum in 2025, with a new edition, this time organised autonomously by the sectors, in order to promote digital literacy, disclose Navigator's digital initiatives and to communicate Digital topics more widely.
- Navigator Family Tour – Continuation of the internal programme in which Employees and their families are invited to visit the industrial complexes, now with special activities for under-twelves who, for safety reasons, cannot join in visits to industrial operations.
- Straight to the Top - STT2.0 – Programme for gathering ideas for improving operational efficiency and cutting costs, with rewards for individuals or teams submitting successful ideas.
- GROWING Project Meeting - The 3rd Project Meeting, to share the progress made and showcase the work done and results achieved, reaching out to new audiences within the Organisation (extended to co-workers not belonging to the taskforces).
- "A Space to Grow" Workshops - Practical and collaborative workshops have been organised, separately for Employees and Leaders, designed to teach them to apply the programmes and tools developed in the GROWING Project in their daily work.

Every two years, and organisational climate survey is conducted of several companies in the Semapa group [S1.38b | S1.38c | S1.38d], the findings of which have helped fill out and update the "CRESCER" (GROWING) Project roadmap. The regular bi-annual Organisational Climate Survey was conducted in 2025, involving the Company's Employees in Portugal, as well as Employees at the international offices and industrial units. The findings are still being analysed. [S1.38b | S1.38c | S1.38d]

Health, safety and well-being

As part of the **Mission Zero** strategy, designed for 2023-2026, an ambitious action plan has been established, based on the five pillars of the strategy: Monitoring and control, Operational excellence, Leadership, Skills and Behavioural programme. This responds to the material impacts and opportunities identified, serving not only to mitigate negative impacts, but also, and above all, to prevent them. [ESRS 2.68a | S1.38a | S1.38c | S1.40b]

The Occupational Health (OH) team has developed initiatives, focussed on the fields of mental health, nutrition and physiotherapy, to provide tools that help the Employees in question to improve their quality of life and adapt to shift working. These initiatives include (Action 1):

- Workshops on sleep, with tips on how to improve sleep quality;
- Nutritional guidelines on what to eat before, during and after shifts;
- Recommendations of exercises to improve muscular structure over the day; and
- SWORD tool, enabling access to online physiotherapy at home.

As a way of promoting the work-life balance, contributing to our Employees' health and welfare, the OH team has worked with a number of managers and Employees to provide information on hobbies and free time activities, inspiring other Employees to join in. This has included (Action 2):

- Exhibitions, information leaflets and webinars;
- Promotion of physical exercise, through information sessions and explanatory leaflets;
- In-person and Teams sessions during the working day; and
- Ergocoaching: combined with physical activity at work, this encourages not just exercise, but also improved muscle condition.

In connection with the strategy pillars relating to the Behaviour and Leadership, Operational excellence and Skills programmes, the actions implemented to reduce the occurrence of work-related accidents or occupational diseases have included (Action 3):

- Gamification - Development of platform with games and weekly challenges concerning safety, procedures, rules and good practices.
- Safety Walks – More than 17 000 walks in 2025, correcting behaviour and improving unsafe conditions identified;
- Safety Moments - Daily sessions for operational teams to consider and discuss important information related to events occurring during the previous week;
- Cross-group Procedures – Design of standards on critical topics such as Work Authorisations, Risk Assessments and Lockout Tagout (LOTO), which is a highly critical procedure related to consignment of equipment and fluid lines;
- Investigation of SIA Accidents - Serious and Irreparable Accidents, such as contact with chemicals, machinery/equipment or work at height, are investigated within 24 hours, with findings submitted to the Director responsible;
- Procedure for intervention in loaded lines, establishing rules and specific protective equipment for each activity; and
- Safety Leadership Certification - roughly 15% of all Navigator Leaders have been certified through a process of practical assessment of the application of safety leadership skills. This process is planned to be extended to all Leaders in 2026.

As a way of encouraging compliance with safety at work rules and procedures, and systems of penalties and rewards for non-compliance/compliance has been implemented (Action 4). This system:

- Recognises and rewards pro-active, exemplary and participative Employees; and
- Penalises those not complying with standards, rules and procedures, through cardinal rules, productivity bonuses and disciplinary procedures.

Aware that workforce training and continuous skills assessment contribute to professional and personal growth by Employees, more than 43 700 training hours were provided on safety topics in 2025 (Action 5). New approaches were adopted to training, in particular:

- Role-playing and gamification dynamics;
- The Industrial Challenge, which involved all Technical Operatives with a focus on risk perception and the neurological issues involved; and
- Increased training for Employees, thanks to the possibility of e-learning and in-person training.

There has also been an important focus on programmes and policies to promote a safe working environment, including training in safety, ergonomics and well-being (Action 6), as a way of boosting Employee satisfaction and productivity and, and the same time achieving a positive impact on reduction of accident numbers, positively influencing Navigator's reputation. The main initiatives were:

- Safety Month with Super Zero Gamification, an artificial intelligence initiative helping Employees and launching safety challenges;
- Quarterly "Safety Conversations", led by Industrial and forestry Managers, involving Supervisors and Technical Operatives; and
- Supervisors' Forum, dedicated to safety, which identified programmes for improvement and proposals for new initiatives in 2026.

The steps taken under Mission Zero were undertaken with the aim of planning, cooperating and supporting the provision of solutions for Employees directly impacted by the material impacts identified. These actions were fundamental in mitigating negative effects and promoting the recovery and welfare of injured Workers. The results achieved are set out in the table above. [ESRS 2.68d | ESRS 2.68e]

Health Month, given over to Physical Exercise, was an opportunity for paying special attention to some of the impacts, risks and opportunities identified as priorities, in particular sedentary lifestyles and physical exercise, healthy and sustainable weight, and wellness activities. [ESRS 2.68a | S1.38a] As part of this initiative, Navigator encouraged its Employees to adopted more active

lifestyles, providing incentives for daily movement activities - walking, running or climbing stairs - using the UPNDO app, which transforms physical activity into social impact. This mobilisation campaign raised a total of 6250€, which was donate to local voluntary fire brigades.

For 2026, in addition with continuing with the work done in 2025, we can point to the following initiatives [ESRS 2.68a]:

- Safety certification for all Leaders.
- Extend the reward programme to collective initiatives and Service providers;
- Develop a platform for safety management;
- Execute project for improving winders/rewinders;
- Implement campaigns on Near Accidents, sharing good practices and incidents witnessed by Employees; and
- Identify the 5 main safety hazards in each sector, with the design of an action plan to eliminate or reduce these hazards - Top 5 Initiative.

5.3.1.3. Targets and metrics

5.3.1.3.1. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5, MDR-T)

In connection with our 2030 Roadmap, and mindful of the importance of responsibly managing the impacts and opportunities related to our Employees, we have established a series of strategic commitments which will enable us to steer and monitor our way forward. These commitments are reflected in specific targets to boost promotion of:

- Safe and responsible behaviour that contributes to a real **safety and wellness culture**, in order to improve working conditions, reducing work-related musculoskeletal disorders (WRMSDs) and consequently occupational accidents and diseases, ensuring a safe and healthy environment for our Employees and culminating in our ambition of achieving zero accidents connected to our operations. [AR49a] Human capital development and training is designed to align skills with the Company's current and future needs, and to contribute to the skills and employability of young people in the regions where we operate.

Goal and target	Scope [ESRS 2.80c]	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75 | ESRS 2.80b]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
Talent management and development of human capital							
Have partnerships with education institutions in all regions where we operate in Portugal (universities and technical colleges) and internship programmes, helping to the develop the skills and employability of young people	Own operations, in Portugal	Benchmark value: - Baseline: 2020	No. of actions in universities and technical colleges No. internship programmes	Participation in 26 initiatives at universities (fairs, pitches and presentations). 31 curricular internships/dissertation projects. 3 open sessions for master's degree finalists at FCTUC, Nova FCT and UA. 8 study grants awarded. 23 visits by student groups to Navigator mills (636 students). 109 vocational internships, of which: • 51 vocational internships for graduates with first and master's degrees, with 27.4% then joining the company; • 58 vocational internships for future operatives, with 67.2% then being hired as Technical Operatives. Hiring of approximately 50% of vocational interns. 3 long-term trainees (24 month programme) hosted; 48 summer interns.	No. of actions in Universities and technical colleges Average plan execution above 90%: 100%, in 2024 (considering only the no. of job fairs). No. of internship programmes Execution of internship plan in 2024: 80.85% 291 Internships 172 vocational internships: • 47 vocational internships for graduates (first degree and master's) (27%); • 125 internships for technical operatives (73%).	No. of actions in Universities and technical colleges Average plan execution above 90%: 100%, in 2025 (considering only the no. of job fairs). No. of internship programmes Execution of internship plan in 2025: 88% 178 Internships (summer, vocational for graduates with first degree and master's and operatives course) • 134 vocational internships/operatives course: • 67 vocational internships for graduates (first degree and master's) (50%); • 67 operatives courses (50%).	Value/outcome to achieve: - Year: 2030 Interim targets: • Integrate 20% of vocational internships at management level • Integrate 50% of internships for Technical Operative positions
Reach 80% of Employees with individual development plans	Own operations, covers all geographical regions except	Reference value: -	% of Employees with development plans customised	26% of all Employees with IDP	31% of all Employees with IDP	36% of all Employees with IDP	Value/outcome to achieve: 80%

Goal and target	Scope [ESRS 2.80c]	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75 | ESRS 2.80b]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
(IDP) customised to their needs and professional plans, in alignment with Navigator's succession needs, by 2030	Ejea and Tissue UK	Baseline: 2020	to their professional needs and aspirations	38% of Technicians/Specialists/ Managers with PDI	53% of Technicians/Specialists/Managers with PDI	66% of Technicians/Specialists/Managers with PDI	Year: 2030 interim targets adjusted in 2025: • 45% of all Employees with PDI in 2026 (Baseline 2021); • 60% of Technicians/Specialists/Managers with PDI in 2026 (Baseline 2022).
Create awareness in teams concerning good ESG practices and the commitment to sustainability by 2026	Portugal	2023	N/A	-	Creating the S-pertise Programme and structuring the syllabus content for training in Sustainability and ESD to be started in 2025. Internal Sustainability Hub launched with sustainability content for Employees.	Disclosure of Sustainability Highlights and preparation of sustainability training course content.	By 2026, conduct periodic awareness raising and provide training to 80% of Employees.
Monitor on a continuous basis the main motivational stimuli for Employees so that more appropriate management practices, policies and processes are implemented	Own operations in Portugal, International Offices and Mozambique	2020 N/A	GROWING Climate Survey No. of Open Days	The **Straight To The Top** Programme covered 4 Industrial Complexes, with the following results: 35 ideas submitted; 1 idea selected for prize. The organisational climate survey recorded a participation rate of 73% (the highest ever in Navigator's surveys).	GROWING - 45% implementation of roadmap of initiatives suggested by Employees. Climate Survey - Average result opf indicators relating to satisfaction and engagement: 65.4 (2023). We held 69 Open Days in 2024 - 34 in	GROWING - 69% implementation of roadmap of initiatives suggested by Employees. After the 2024 revamp, we held 43 Open Days in 2025 - 31 in the 1st half and 12 in the 2nd half.	GROWING: 100% implementation of roadmap, in 2030. Climate Survey: Average >70% on indicators relating to satisfaction and engagement in climate survey.

Goal and target	Scope [ESRS 2.80c]	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75 | ESRS 2.80b]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
					the 1st half and 35 in the 2nd half.		
Health, safety and well-being							
Accidents, through continuous improvement in safety, with the new OHS Strategy 2021-2025: - Frequency index of ≤ 2 in 2030	Own operations, Iberia. Covers internal Employees and external Workers	Reference value: 6.6 Baseline: 2020	Frequency index	5.8	4.1	2.8	Value/outcome to achieve: Frequency index (FI) ≤ 2.0 (internal and external Employees) Year: 2030 Interim target Achieve a Frequency Index = 2.6 in 2025 (Baseline 2022). For 2026, We have a fairly aggressive target of 1.9, bringing our 2030 target forward by 5 years.
Achieve a frequency rate for work-related accidents of ≤0.3, in 2025	Own operations in Mozambique. Covers internal Employees and external Workers	Benchmark value: 2.5 Baseline: 2022	Frequency index	1.6	0.36	0 (Target achieved in 2025)	Frequency Index: ≤0.3 Year: 2025
<10% uncharacterised accidents due to non-compliance with rules and procedures	Own operations, Iberia Covers internal Employees and external Workers	Reference value: 49% Baseline: 2022	% accidents declassified due to non-compliance with rules and procedures	-	19%	28%	Value/outcome to achieve: <10 % Year: 2030
Develop the Ergonomics Action Area: 100 workstations redesigned, by 2030	Own operations, Iberia	Benchmark value: 52 Baseline: 2022	Workstations redesigned (accumulated) - Ergonomics Project	72 (accumulated figure)	202 (accumulated figure)	284 (accumulated figure)	Value/outcome to achieve: 100 workstations redesigned Year: 2030

Goal and target	Scope [ESRS 2.80c]	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75 | ESRS 2.80b]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
Develop the Occupational Health programme up to 2030: - Work Ability Index (WAI): 45% in 2030; - Assessment of Employee satisfaction with programme: >95 %	Own operations, covers all geographical regions except Navigator Tissue Ejea and Navigator Tissue UK	Reference value: - Baseline: 2020	Capacity for work index Employee satisfaction assessment	Insofar as this index is monitored every 4 years, the WAI will be reassessed in 2025. Assessment of Employee satisfaction with programme: 97%	Insofar as this index is monitored every 4 years, the WAI will be reassessed in 2025. Assessment of Employee satisfaction with programme: 97%	WAI: 40.2% Assessment of Employee satisfaction with programme: 98%	Value/outcome to achieve: • 45% • >95% Year: 2030

Target setting process

In general, our targets are set through benchmarking exercises, considering best practices in the sector and, in specific cases (such as the percentage of the number of uncharacterised accidents due to non-compliance with rules and procedures and workstations redesigned, for example), we consider the evolution of results obtained over the past three years, in relation to the action plan established (aggregating different initiatives and actions). [S1.46 | ESRS 2.80f | S1.47] The opinions of different internal and external Stakeholders are also taken into account, through the different forums and procedures for dialogue, such as the Sustainability Forum, seeking to ensure transparency and alignment with the expectations of the Communities, Authorities and Experts.

In developing our targets, we seek on the one hand to ensure a focus on ongoing development of our Employees, in alignment with Navigator's strategic goals, and also to take into consideration the local context of the geographical regions where we operate. In this regard, attention is drawn to our contribution to improving the skills and employability of young people, which includes interior regions of Portugal, where some of our mills are located. [S1.46 | ESRS 2.80f]

In order to ensure effective monitoring of our performance in relation to the targets set, we regularly track evolution, using daily, monthly or quarterly assessments, depending on the specific features of each indicator. [S1.47] We have also been working on a range of initiatives and opportunities for internal sharing, such as the Safety Moments, Weekly Meetings, quarterly industrial meetings and local industrial meetings, ensuring regular and integrated analysis of performance. The findings are also presented and discussed at the steering committees and the local and corporate OPHS committees, where corrective and improvement measures are also defined. [S1.47] In addition, as part of our commitment to continuous improvement, the lessons learned and achievements are widely disseminated, promoting a safety culture and strengthening the application of preventive measures and penalties, whenever necessary. [S1.47]

In particular, the Zero Accidents Target and redesigning of workstations (Develop Ergonomics Action Area) were developed in alignment with the safety policy, part of management systems, with the aim of providing safe and healthy working conditions in order to prevent work-related injuries and diseases, adhering to the principles of continuous improvement. [S1.46 | ESRS 2.80a] Stakeholders were involved in setting these targets, incorporating information about internal and external Employees, who receive training and information on rules and procedures, as well as information on the penalties applicable in the event of non-compliance. [S1.46 | ESRS 2.80h]

Although we believe it is essential to have a long-term plan of action that points us towards honouring the commitments set out in our 2030 Agenda, it should be noted that, as a corporate management tool, the Roadmap is not static. An annual reflection process can lead to fine-tuning of some of the goals established, setting or adjustment of interim targets: and, in some cases, the setting of new targets. [S1.46 and ESRS 2.80i]

Performance in relation to the targets

Talent management and development of human capital

A number of measures were implemented in 2025 to promote and help build Individual Development Plans (IDPs), consolidating a culture of continuous growth. The main initiatives included prioritising the Employees to benefit from this plan, ensuring wider access, and constant communication, through multiple channels, such as email, Intranet, webinars and training. In collaboration with the Learning Centre, these plans were taken as the basis of identifying new training needs and incorporating them in the annual training plan. In addition, the performance assessments and development programmes continued to include specific guidelines for the design or adjustment of plans, whilst the Talent Review process continue to provide personalised development

guidelines for all the Employees involved. The Performance Improvement Plan process has continued to be implemented in the field, with a focus on development and design of these growth tools.

As the interim targets were not achieved in 2025, they have been extended to 2026 [S1.46 | ESRS 2.80i]:

- 45% of all Employees with PDI in 2026 (Baseline: 2021);
- 60% of Technicians/Specialists/Managers with PDI in 2026 (Baseline: 2022).

Our commitment to improving the employability of young people is reflected in 134 vocational internships for graduates (first degree and master's) and the Operatives Course, in 2025. A new training pathway was created for future Technical Operatives in 2024, in partnership with IEFP, seeking to make this programme more attractive to young people, eliminating the work experience component and expanding the practical component. This new model is called the Operatives Course.

Whenever possible, we run these intern/courses under the state IEFP programme, contributing to youth employability policies. In 2025, the integration rate for Technical Operatives on the Operatives Course was 65%, and two training courses are still under way, meaning that the interim target was exceeded by 15 pp. In the case of Management and Technical Staff, the integration rate was 1%, and so we fell short of the interim target by 19 pp. However, some of the internships which started in 2025 are still in progress and those already completed have contributed to youth emplopyability in the labour market, thanks to skills development, to the real working experience and to Navigator's strong reputation. [S1.46 | ESRS 2.80j]

Health, safety and well-being

In relation to our performance in 2025, implementation and execution of our Mission Zero strategic plan enabled us to achieve the best ever Frequency Index (FI), with a result of 2.8 – slightly above the target set for 2025 (FI= 2,6) –, demonstrating the effectiveness of the an integrated and multidisciplinary approach.

This result reflects an ever stronger safety culture, where every action counts and where protection of our people always comes first. The various measures implemented (see section S1-4) included efforts in areas such as ongoing training, with more than 37,000 hours of safety training, and the introduction of innovative methodologies, such as gamification, the Top 5 preventive indicators, Safety Leadership Certification and role-playing. [S1.46 | ESRS 2.80j | S1.47] Promotion of healthy practices, such as Ergocoaching and wellness activities, combined with the design of cross-sector procedures for critical topics, contributed to a safety culture which is increasingly well established. Initiatives such as Safety Walks, the Supervisors' Forum and Safety Conversations were crucial in involving all levels of the Organisation in identifying hazards and implementing solutions. [S1.46 | ESRS 2.80j | S1.47]

We also exceeded the target set for 2030 for the number of ergonomically redesigned workstations (100), having achieved in 2025 an accumulated total of 284 redesigned workstations. [S1.46 | ESRS 2.80j | S1.47] In the case of Mozambique, the Frequency Index has been monitored since 2020, pointing to a continuous improvement in safety, thrnks to significant investment in raising Community awareness of the need to operate safely and to educate Service providers, who have traditional focused more on operations and less on questions of safety and the environment. These efforts succeeded in bringing the Frequency Index down from 0.36 in 2024 to 0 in 2025, with no accident resulting in sick leave, in a particularly challenging year, in view of the increase in forest harvesting activities which, as is widely recognised. involve greater hazards to people, not least because in this instance they are conducted manually. However, with the aim of obtaining a more comprehensive picture, Portucel Moçambique adopted the measurement of a Combined Safety Indicator, integrating the FI (with a weighting of 60%) and the Severity Index (weighting of 40%, leading to a better assessment both of the number of accidents with sick leave and of their severity.

In 2024, Portucel Moçambique started to monitor a combined indicator for Occupational Health and Safety, integrating the Frequency Index (60%) and the Severity Index (40%), in order to reflect not only the number of accidents with sick leave, but also their severity. This approach offers a more comprehensive assessment of the operational risk and of the effective impact of accidents on people and on the organisation. In 2024, the combined indicator stood at 3.1. There was a significant improvement in 2025, with the indicator standing at 0, due to the absence of any accidents leading to sick leave during the period in question.

5.3.1.3.2. Characteristics of the Company's employees (S1-6)

Navigator is present in several countries, and has close to 4000 employees. Responsible management of our human capital is fundamental for ensuring a fair and inclusive working environment, also contributing to talent retention. Below we present the main characteristics of Navigator's workforce[42]. This information is essential for understanding the impact of the Navigator Group's employment practices and for designing informed strategies in human capital management.

[S1.50a]	**Total Employees, by gender**	**2025**	**2024**	**% Δ (2024-2025)**
	Number of Employees (headcount)			
S1-6-002	Male	3170	3213	-1.34%
S1-6-003	Female	762	752	1.33%
S1-6-004	Others	--	--	--
S1-6-005	Not disclosed	--	--	--
S1-6-001	**Total Employees**	**3932**	**3965**	-0.83%

[S1.50a]	**Total Employees, by country/region**	**2025**	**2024**
	Number of Employees (headcount)		
S1-6-006	Portugal	3208	3180
	Mozambique	107	128
	Spain	187	176
	France	10	9
	Italy	8	8
	Germany	7	7
	USA	7	7
	United Kingdom	386	437
	Netherlands	2	3
	Turkey	3	3
	Poland	2	2
	Austria	2	2
S1-6-007	South Africa	1	1
S1-6-008	Morocco	1	1
S1-6-009	Mexico	1	1

[42] It should be noted that these figures do not include interns/bursary holders and corporate officers.

The 2025 data refer to the number of Employees at 31 December and include all Workers with an employment contract with Navigator. The total number of Employees includes members of the Board of Directors. [S1.50d] The total number of Employees is also disclosed in nos. 7 and 7.1 of the Notes to the Financial Statements. [S1.50f]

[S1.50b | S1.52]	Total number of Employees by type of employment contract, by gender	2025	2024
S1-6-003, S1-6-002, S1-6-004, S1-6-005, S1-6-001	**Number of Employees**		
	Male	3170	3213
	Female	762	752
	Others	--	--
	Not disclosed	--	--
	Total	**3932**	**3965**
S1-6-003, S1-6-002, S1-6-004, S1-6-005, S1-6-001	**Number of Permanent Employees**		
	Male	2933	3007
	Female	697	694
	Others	**--**	**--**
	Not disclosed	**--**	**--**
	Total	**3630**	**3701**
S1-6-021, S1-6-020, S1-6-022, S1-6-023, S1-6-019	**Number of Temporary Employees**		
	Male	237	206
	Female	65	58
	Others	**--**	**--**
	Not disclosed	**--**	**--**
	Total	**302**	**264**
S1-6-028, S1-6-027, S1-6-029, S1-6-030, S1-6-026	**Number of hours of work not guaranteed to Employees**		
	Male	0	0
	Female	0	0
	Others	--	--
	Not disclosed	--	--
	Total	**0**	**0**

Note: The 2024 numbers of permanent and temporary Employees were updated in line with the contents of the 2024 Annual Report. [ESRS 2.13]

[S1.50b | S1.51 | S1.52]	**Total number of Employees by type of contract, by region**	**2025**	**2024**
S1-6-010, S1-6-011, S1-6-001	**Number of Employees**		
	Portugal	3208	3180
	Outside Portugal	724	785
	Total	**3932**	**3965**
S1-6-017, S1-6-018, S1-6-012	**Number of Permanent Employees**		
	Portugal	2944	2950
	Outside Portugal	686	767
	Total	**3630**	**3717**
S1-6-024, S1-6-025, S1-6-019	**Number of Temporary Employees**		
	Portugal	264	230
	Outside Portugal	38	18
	Total	**302**	**248**
S1-6-031, S1-6-032, S1-6-026	**Number of hours of work not guaranteed to Employees**		
	Portugal	0	0
	Outside Portugal	0	0
	Total	**0**	**0**

The 2025 data refer to the number of Employees at 31 December and include all Workers with an employment contract with Navigator. [S1.50d]

Temporary Employees are recruited on the basis of explicit contracts, stipulating working hours and place of work. These contracts are essentially entered into to make up for shortages of human capital or to secure specialist expertise needed for temporary projects or events. [S1.AR56]

[S1.50c]	**Employee Turnover**	**2025**	**2024**
	Number of Employees (headcount)		
S1-6-047	Number of Employees leaving Company	437	355
	Average headcount in reporting period	3977	3784
S1-6-048	Employee Turnover (%)	11.0%	9.4%

Note: In 2024, the number of employees leaving Navigator Tissue UK and the total workforce were counted as from the acquisition date (May).

For 2025, all employees leaving over the year were counted, [AR56 | AR60 | S1.50d], taking as denominator the average workforce for the 12 months of the year. [AR59 | S1.50d]

5.3.1.3.3. Characteristics of non-employee workers in the Undertaking's own workforce (S1-7)

There are non-employee Workers in Mozambique, both as services providers, and also hired through employment agencies. These Workers perform their duties independently, with no direct contract with a fixed employer, and are paid for the services provided or on the basis of the contracts concluded. [S1.55c]

The number of non-employee Workers is disclosed in the workforce. They correspond to Temporary Workers (TWs) working full-time at year-end 2025 [S1.55b-1 | S1.55b-2], and only Workers from temporary employment agencies or independent Workers were considered. [S1.55b-2]

[S1.55a]	**Number of non-employee Workers**	**2025**	**2024**
	Non-Employees		
S1-7-001	Portugal	112	124
S1-7-002	Mozambique	162	182
S1-7-003	United Kingdom	10	0
S1-7-004	Spain	15	17
	Other regions	0	0
	Total	**299**	**323**

5.3.1.3.4. Collective bargaining coverage and social dialogue (S1-8)

The figures presented do not include information on geographical regions where the Group has a workforce of less than 50. [S1.55b]

[S1.60]	**Collective labour agreements**	**2025**	**2024**
	Coverage of Collective labour agreements (%)		
S1-8-002	**Within the EEA**	**99%**	**99%**
S1-8-003	Portugal	100%	100%
S1-8-004	Spain	89%	89%
	France	--	--
	Italy	--	--
	Germany	--	--
	Netherlands	--	--
	Poland	--	--
S1-8-005	Austria	--	--
S1-8-007	**Outside the EEA**	**--**	**--**
	S1-8-008 Mexico	--	--
	Mozambique	--	--
	USA	--	--

[S1.60]	Collective labour agreements	2025	2024
	United Kingdom	--	--
	South Africa	--	--
	Morocco	--	--
S1-8-009	Turkey	--	--
S1-8-001	Total	**86%**	**84%**

[S1.63a]	Social dialogue	2025	2024
	Social dialogue (%)		
S1-8-010	**Within the EEA**	**99%**	**99%**
	Portugal	100%	100%
	Spain	89%	89%
	France	--	--
	Italy	--	--
	Germany	--	--
	Netherlands	--	--
	Poland	--	--
	Austria	--	--
	Outside the EEA	**--**	**--**
	Mexico	--	--
	Mozambique	--	--
	USA	--	--
	United Kingdom	---	--
	South Africa	--	--
	Morocco	--	--
	Turkey	--	--
S1-8-001	Total	**86%**	**84%**

[AR70] **Reporting model for coverage of collective bargaining and social dialogue**

Coverage rate (%)	Collective bargaining coverage		Social dialogue
	Employees — EEA (for countries with >50 Employees representing >10 % of total Employees)	Employees – Outside EEA (estimate for regions with >50 Employees who represent >10 % of total Workers)	Representation at workplace (only EEA) (for countries with >50 Employees who represent >10 % of total Workers)
0 - 19%	n/a	United Kingdom and Mozambique	n/a
20 - 39%	n/a	n/a	n/a
40 - 59%	n/a	n/a	n/a
60 - 79%	n/a	n/a	n/a
80-100%	Portugal and Spain	n/a	Portugal and Spain

Navigator has not agreement with the Company's Employees for representation by a European Works Council, a European company Works Council or a European Cooperative Society (SCE) Works Council. [S1.63b]

5.3.1.3.5. Diversity metrics (S1-9)

In the figures presented, Employees in skilled jobs were considered as Senior Management, excluding Technical Operatives and Supervisors working on the factory floor. [AR71]

[S1.66a]	Gender breakdown in Senior Management	2025	2024
	Employees in Senior Management		
S1-9-002	Male	917	870
S1-9-003	Female	550	535
S1-9-004	Others	--	--
S1-9-005	Not disclosed	--	--
S1-9-001	**Total**	**1467**	**1405**

[S1.66a]	Gender breakdown in Senior Management (%)	2025	2024
	Employees in Senior Management(%)		
S1-9-006	Male	62.51%	61.92%
S1-9-007	Female	37.49%	38.08%
S1-9-008	Others	--	--
S1-9-009	Not disclosed	--	--

[S1.66b]	Breakdown of Employees by age range	2025	2024
	Number of Employees		
S1-9-010	<30 years of age	549	559
S1-9-011	30-50 years of age	2420	2448
S1-9-012	>50 years of age	963	958

5.3.1.3.6. Adequate wages. (S1-10)

In all countries where we operate, we ensure the wages paid are fair and adequate, guaranteeing that they are above the minimum wage for each country. [S1.69]

In addition, in the United Kingdom, we are the first tissue company to be accredited by the Living Wage Foundation, and since 2022 we have ensured that all our Employees are paid in accordance with a Living Wage or above this.

5.3.1.3.7. Training and skills development metrics (S1-13)

[S1.83a]	Percentage of Employees who took part in regular performance and career advancement assessments (%)	2025	2024
	Gender		
S1-13-002	Male	98%	92%
S1-13-003	Female	98%	89%
S1-13-004	Others	--	--
S1-13-005	Not disclosed	--	--
	Total	98%	92%

The figures presented for 2025 under Performance Assessment relate to 2024, insofar as 2025 Performance Management Cycle has not yet been concluded. We considered all Employees in Portugal, Mozambique, international offices and Ejea Management and Technical Staff, not including either Technical Operatives in Ejea or the United Kingdom tissue unit, planned for inclusion in 2026. Employees who had a performance assessment in 2024 were assessed once in the year in question [S1.AR77a], in line with the agreed number of reviews. [S1.AR77b]

Up to 2023, the Performance Management Model covered only Employees joining the Company up to 30 June that year. As from 2024, all Employees joining the Company up to 30 September were included. Employees joining as from 1 October were subject to an integration assessment process. As a result, in 2024, we consider both Employees assessed using the performance assessment and those assessed using the integration assessment.

[S1.83b]	**Average number of training hours per Employee**	**2025**	**2024**
	Gender		
S1-13-049	Male	97	100
S1-13-050	Female	62	64
S1-13-051	Others	--	--
S1-13-052	Not disclosed	--	--
	Total number of training hours per Employee	**90**	**93**

The figures presented represent the total training hours for 2025, considering the number of permanent employees on the final day of the corresponding year. For 2025, a total of 3534 Employees were considered, 688 of the female gender and 2846 of the male gender, corresponding to all Employee except those at the United Kingdom tissue unit. In the case of the Ejea tissue unit, only e-learning recorded on the Learning Centre portal was considered, and not training provided locally, in view of the stage we have reached in the systems transition.

5.3.1.3.8. Health and safety metrics (S1-14)

Navigator has an Occupational Health and Safety Management System (OHSMS), implemented in accordance with ISO 45001 and certified by an external body.

The figures presented refer to the OHS Management System in Portugal and Navigator Tissue Ejea, certified under ISO 45001. There are various activities in the organisation, in particular Forest Management, Wood Supply and RAIZ, which do not fall under ISO 45001. However, activities in these sectors are subject to the same principles and procedures.

[S1.88a]	**Percentage of Workers covered by a health and safety management system (%)**	**2025**	**2024**
	Number of Employees		
S1-14-001	Manpower	79.1%	74.6%
S1-14-002	Employees	83.2%	78.4%
S1-14-003	Non-Employees	25.9%	27.9%

Note: In 2024, the indicator did not include Mozambique and the United Kingdom.

In the period in question, there were no fatalities to report in Navigator's operations. [S1.88b]

With regard to work-related accidents, the figures present relate to operations in Portugal, Spain and Mozambique, and in other geographical regions the Company is still in the process of integrating the information. In Mozambique, in 2025, no accidents leading to sick leave were recorded.

[S1.88c]	Accidents at work	2025	2024
	Portugal and Spain		
S1-14-017	Manpower	182	159
S1-14-018	Employees	173	149
S1-14-019	Non-Employees	9	10
	Mozambique		
S1-14-017	Manpower	13	5
S1-14-018	Employees	2	2
S1-14-019	Non-Employees	11	3

[S1.88c]	Accidents at Work (per 1,000,000 hours)	2025	2024
	Portugal and Spain		
S1-14-020	Manpower	31.1	28.6
S1-14-021	Employees	30.3	27.8
S1-14-022	Non-Employees	60.7	50.2
	Mozambique		
S1-14-020	Manpower	6.6	1.7
S1-14-021	Employees	8.3	7.6
S1-14-022	Non-Employees	6.3	1.1

Note: The 2024 figures have been updated and adjusted in the light of the 2024 Annual Report.

For Portugal and Spain, in the number of hours worked relating to Employees, we considered the records in the Company's information system Hours worked in relation to non-employee Workers are estimated on the basis of the number of Workers entering through the gates and whose access is recorded in the computer system, assuming they work an average of 8 hours a day. In the case of forestry sectors, there are dedicated records and control of the collection of this information. The Projects Department collects its own information, which is counted by local teams. [S1.AR90]

In Mozambique, hours workers are counted on a separate basis for the three groups considered: Number of permanent employees; Individual service providers (ISPs) and Casual labour. For each of these groups, the methodology applied was the following [S1.AR90]:

- Permanent employees: (Number of working days in each month x 8 h) x number of employees - days of absence of Employees in this category
- Individual service providers: Number of working hours in each month x number of ISPs
- Day sheets (working days) collected by the operational team and used to process payments.

The figures presented below relate to activities in Portugal and Mozambique.

Number of confirmed occupational diseases	2025	2024

	Work-related diseases		
S1-14-023	Employees	0	4
S1-14-024	Non-Employees	0	--

In the case of number of days lost, the figures presented below refer to Portugal, Spain and Mozambique.

	Number of days lost due to work-related injuries and deaths due to work-related accidents, health issues and deaths due to the disease, in Employees.	**2025**	**2024**
	Portugal and Spain		
S1-14-025	Employees	1286	2187
S1-14-026	Non-Employees	--	--
	Mozambique		
S1-14-025	Employees	0	0
S1-14-026	Non-Employees	0	20

Note: In Mozambique, the 20 days' sick leave indicated for 2024 were the result of a single (the only) accident leading to sick leave, which involved an external Workers (of a forestry Service Provider).

5.3.1.3.9. Work-life balance metrics (S1-15)

The information presented covers Employees in all geographical regions. The calculation considered parental, paternity, maternity and family related leave.

It should be stressed that 100% of Employees are entitled to family related leave.

[S1.93]	**Percentage of Workers entitled to family assistance leave and taking the same (%)**	**2025**	**2024**
S1-15-003	Male	6.5%	5.9%
S1-15-004	Female	10.8%	8.8%
S1-15-005	Others	--	--
S1-15-006	Not disclosed	--	--
S1-15-006	**Total**	**7.3%**	**6.5%**

Note: The 2024 figures have been adjusted in the light of the 2024 Annual Report and no include Employees in the United Kingdom. [ESRS 2.13]

5.3.1.3.10. Remuneration metrics (pay gap and total remuneration) (S1-16)

[S1.97a]	Pay gap (%)	2025	2024
S1-16-001	**Total**	**-1.6%**	**1.7%**

[S1.97b]	Total annual remuneration ratio	2025	2024
S1-16-018	**Total**	**29.72**	**30.24**

In order to calculate the pay gap between men and women, we considered only regular monthly remuneration at 31/12/2025 (which includes base remuneration, exemption from working hours (EWH) pay, complementary remuneration, shift allowance, performance of duties and meal allowance), calculated on an annual basis. [S1.97c]

In order to calculate the total annual remuneration ratio, we considered the total monthly remuneration of the lowest paid individual in relation to the median of total annual remuneration of the headcount (excluding the highest paid individual). Salary data are based on all regular monthly remuneration (which includes based remuneration, EWH allowance, shift allowance and other complementary monthly remuneration of a regular character), in addition to the meal allowance, calculated annually. For this purpose we used the entire Navigator headcount at 31/12/2025.

5.3.1.3.11. Incidents, complaints and severe human rights impacts (S1-17)

The total number of work-related discrimination incidents, including harassment and complaints, reported by Ethics & Compliance, corresponds to the reports received through the Whistleblowing Channel (see section S1-3). As mentioned above, this channels is intended to be used by Employees, Suppliers, Clients, Service Providers, Local Communities or any other interested parties, to report irregularities. It can be accessed online and through the Navigator intranet. [S1.103d]

In addition, Portucel Moçambique has a Complaints Management System for gathering and managing complaints from Communities. [S1.103d]

The number of complaints made by Workers through channels for raising concerns reflects the total reports received by this channel over the course of 2025, which includes other issues, in addition to those concerning Human Rights. No severe Human Rights incidents were confirmed in 2025.

		2025	2024
[S1.103a] S1-17-001	Total number of work-related discrimination incidents, including harassment, communicated in the reporting period	1	1
[S1.103b] S1-17-002	Number of complaints submitted by Workers through channels for raising concerns	22	37
[S1.103c] S1-17-003	Fines, penalties and compensation for damages (€)	0	0
[S1.104a] S1-17-04	Number of severe Human Rights incidents related to the Company's manpower	0	0

[S1.104b] S1-17-05	Total value of fines, penalties and compensation for damages caused by severe Human Rights incidents relating to the Company's manpower (€)	0	0
[S1.106] S1-17-06	Number of severe Human Rights incidents in which the Company played a role in guaranteeing relief for the persons affected	0	0

5.3.1.3.12. Entity-specific metrics (MDR-M)

In addition to the metrics to be reported under the ESRS, Navigator monitors a series of additional metrics which assist in analysis of its performance. [ESRS 2.77c]

Young Talent

In this metric we counter the vocational and summer internships in 2025, in the course of which 53 658 training hours were provided to 272 interns. [ESRS 2.77a]

[ESRS 2.77c – Entity-specific metrics]

Young Talent	2025	2024
No. of young people in Talent Attraction Programme	272	298
Integration rate (%)	31%	50%
No. training hours for interns	53 658	21 292

Note: The Talent Attraction Programme counts all vocational and summer interns in 2025. Up to 2024, the number of training hours considered interns who were working for the Company on 31 December of the corresponding year. In 2025, as the result in a change to the duration of IEFP internships, all training hours provided over the year to vocational and summer interns were considered.

Childbirth Bonus

With a view to supporting parents, we offer a Childbirth Bonus which consists of a payment equivalent one month's base remuneration for all Employees with children born as from 1 January of each calendar year. The Childbirth Bonus is paid in the month subsequent to the birth of the child, and in 2025 it was awarded to 93 Employees, corresponding to an investment of 145 010 euros. [ESRS 2.77a]

[ESRS 2.77c – Entity-specific metrics]

Childbirth Bonus	2025	2024
No. of Employees	93	109
Value of bonus (€)	145 009.94	150 652.54

Note: The Childbirth Bonus is awarded to all Navigator Employees.

Employee salaries and benefits

[ESRS 2.77c – Entity-specific metrics]

Employee salaries and benefits	2025	2024
Employee salaries and benefits	216 643	202 709

Note: Evolution of Employee's pay and benefits refers to all Group companies. This metric corresponds to GRI indicator 201-01.

Allowances and benefits

In 2025, a total of 10 492 390 euros was paid out in benefits and welfare allowances, under family support programmes and benefits awarded to Employees in Portugal, such as health insurance, life insurance and pension fund, corresponding to average investment per Employee of 2852 euros.

Nationalities

At year-end 2025, Navigator had Employees of 45 different nationalities in its workforce.

[ESRS 2.77c – Entity-specific metrics]

Nationality	2025	2024
No. of Nationalities	45	40

Occupational Health Programme

Our approach to Occupational Health and Safety(OHS) places Employee welfare at the centre of operations. To this end, we operate a robust Occupational Health (OH) system, staffed by a psychologist, a nutritionist, a social worker and four physiotherapists, as well as a medical team (comprising six occupational health physicians, four curative medicine physicians and 20 nurses), who provide easily accessible care for all Employees in industrial, forestry and administrative sectors.

The mills in Portugal are equipped with Medical Units, providing specialist care whenever necessary. The nursing team provides care round the clock, except at the Vila Velha de Ródão plant, where the service is available during daytime working hours. The different specialities in the Occupational Health team work closely with each other, ensuring integrated and multidisciplinary care and undertaking initiatives designed to prevent risks, promote health and improve the quality of life at work.

One of the key projects in this strategy is the Ergonomics Project, which is running at all industrial units and nurseries, with more than 280 redesigned workstations. This initiative, led by physiotherapists from the Occupational Health team, sets out to analyse workstations identified as critical, through regular visits to the field and feedback from Employees. Investment in this project has been significant, but the results point to a reduction of approximately 50% in work-related musculoskeletal disorders since the start of the project. Complementing this preventative approach, workplace physical exercise has been an essential element in efforts to promote health. We provide daily sessions on Teams, ensuring that all Employees can take part, irrespective of their location. More than 1000 Employees have registered, and regularly join the sessions, both in person and online. This initiative has helped reduce work-related musculoskeletal disorders (WRMSDs), pointing to the importance of movement and physical wellness in preventing health problems. In addition to these initiatives, we have continued to step up our commitment to promoting health through structured programmes (sleep analysis, diet for shift workers and social welfare, for instance), as well as Health Month (celebrated each year in October), which involves outreach activities with the operational teams, dedicated in 2025 to the theme of Physical Activity.

In order to complement this support, we also provide Health Insurance for Employees in all geographical regions, offering access to broad network of medical and specialist services.

[ESRS 2.77c – Entity-specific metrics]

Occupational Health Programme	2025	2024
No. of physiotherapy consultations	2037	2116
No. of nutrition consultations	725	716
No. of consultations in Psychology and Welfare	998	1044
Days of sick leave avoided	242	277
No. of Employees reached	1404	2671
No. partial/total recoveries	522/124	321/137

Ergonomics Project

Project which includes a number of initiatives, in particular changes to work stations and raising Employee awareness of correct postures for performing particular tasks.

[ESRS 2.77c – Entity-specific metrics]

Ergonomics Project	2025	2024
No. workstations redesigned	284*	202*
No. of actions undertaken		
No. of actions approved	334	214
No. of actions implemented	228	141

*Accumulated figures since the start of the project.

5.3.2. ESRS S2: Workers in the value chain

5.3.2.1. Strategy

5.3.2.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Non-compliance with occupational safety rules and procedures can have a negative effect on the health and safety of Workers.	Negative impact	--	Upstream/Own operations	Health and safety
Worker training and skills development has a positive impact on their output.	Positive impact	--	Upstream/Own operations/Downstream	Training and skills development
Ensuring that all Workers have access to conditions of hygiene, sanitation and drinking water has an impact on the health of value chain Workers.	Positive impact	--	Own operations	Water and sanitation

NB: the material impacts identified are actual, and so there is no associated time horizon.

Navigator's approach to sustainability is based on developing business with responsible management, which includes the **workers in its value chain**, as part of this **responsible conduct**. We have adopted a comprehensive approach to ensure the **occupational health and safety (OHS)** of all those working throughout our value chain, including direct Employees (Chap. 5.3.1) and the **workers of our Suppliers, Service providers and Partners**. In addition to these groups, in the case of Portucel Moçambique, we include the workers of our Clients (for example, in business models entailing purchase of standing timber), whenever they carry out work within the areas under our management, and also casual workers who play an important role in the workforce, corresponding to the equivalent of 290 full-time positions in 2025. We focus our action on the groups subject to material impacts for Navigator: **service providers, casual labourers and Clients' workers** who work in **forestry activities under the Company's management**, and also **service providers and our suppliers' workers** who work in **industrial activities**. [S2.11a]

Recognising that non-compliance with safety at work rules and procedures can have a negative impact on the health and safety of Workers, we promote a **safety culture**. aligned with our **Mission Zero** strategy, designed to eliminate work-related accidents. Mission Zero's aim encompasses all those who work and collaborate with us, without excluding Workers belonging to any specific groups, geographical regions or other classifications. [S2.10a-1 | S2.11]

We set strict **criteria** for selecting **Suppliers and Partners** – through specific policies, in our **Service Providers' Handbook**, among other documents (see section on "supplier selection" in chapter 5.4.1.2.2) –, we require them to familiarise themselves and comply with the procedures and rules in force in the Company, ensuring implementation of preventive practices and promoting hazard audits and assessments, which ensure conformity without occupational health and safety standards and contribute to adapting the business strategy. We underline the importance of the safety culture through our **Occupational Health and Safety Management System**, certified under **ISO 45001**, ensuring that both direct Employees and external Workers can do their jobs in safe conditions (Chap. 5.3.1). [S2.10a-1]

We attach value to **ongoing training** as a key tool for developing the skills of Workers in our value chain. By providing training in occupational safety, correct use of Personal Protective Equipment (PPE) and management of operational risks, we contribute not

only to reducing accidents, but also to improving the skills of the workforce, which has a direct impact on their performance and output. [S2.10a-1]

In **forestry operations**, the **Operations Quality Control procedure** checks that the practices of our Service Providers comply with the technical standards, legal, social and environmental requirements in force, minimising the risk of failure in the operations carried out. The findings inform the choice of Service providers for execution of future operations. The Safety File and General Waste Management, together with the respective safety procedures, are equivalent to the Service Providers Handbook referred to above, and constitutes a specific instrument for forestry activities. In **Logistics and Transport**, the Environmental and Safety Procedure in Road Transport serves as equivalent to the Service Providers Handbook, constituting a specific instrument for transport activities. [S2.10a-2 | S2.10a-1]

We do not operate in geographical regions or market products associated with significant risks of **child, forced or compulsory labour** in the Company's value chain. In addition, the products we purchase are mostly not labour intensive, which helps to reduce even further the likelihood of the occurrence of those risks. At the same time, in the United Kingdom we operate in accordance with the Ethical Trading Initiative Base Code, as part of our response to the Modern Slavery Act 2015, adding to our commitment to fair and responsible labour practices. [S2.11b]

The material negative impacts identified may be classified either as generalised or systemic, or else as related to specific incidents or commercial relationships. [S2.11c] **Generalised or systemic** impacts are the result of structural factors, such as failings in the safety culture, gaps in training or weak points in the oversight of OHS practices in the value chain. These impacts may manifest themselves through recurrent tendencies, such as an increased rate of accidents among contractors due to their being less familiar with the internal procedures. Impacts related to individual **incidents or specific commercial relationships** may arise from occasional situations of non-performance by Service providers or Workers, resulting in accidents or risk events. [S2.11c]

Irrespective of origin, non-compliance with rules and procedures may lead to serious work-related accidents, which adds to the need for strict supervision, audits and frequent monitoring, as well as full compliance with our **Service Providers Handbook** or the specific equivalent documents for forestry activities. [S2.11c]

Activities which result in **positive material impacts** include OHS training, audits and regular inspections, sharing of good practices and integration of Service providers in the Company's safety culture. [S2.11d] The main types of value chain Workers who are or may be positively affected include: [S2.11d]

a) **Hired Workers, Service providers** and **Service providers' casual Workers** - by complying with rules and procedures, they reduce exposure to risk and improve their OHS performance.

b) **Supervisors and safety management teams** - benefit from a more controlled and predictable environment, facilitating identification and mitigation of risks.

c) **Internal Employees who interact with third parties** – are impacted by the overall improvement in the safety culture, which reduces accidents and promotes a saver working environment.

It should be noted that the Workers of Service providers and, whenever applicable, those in the logistics and transport sector, are provided with specific rest areas within Company facilities, as well as access to bathrooms, changing rooms and water points. This ensures that these Workers have access to adequate hygiene, sanitation and drinking water, promoting their welfare, health and better working conditions. [S2.11d]

After an internal assessment conducted by Navigator, no Workers were identified with specific characteristics or in a particular setting who, in carrying out their value chain activities, were exposed to added risk of damage, in accordance with the impacts and risks identified in the materiality assessment. [S2.12] Strict compliance with rules and procedures, combined with structured and ongoing training, accordingly raises the level of operational safety, resulting in a reduction in incidents and a stronger safety culture throughout the value chain. [S2.11d]

5.3.2.2. Management of impacts, risks and opportunities

5.3.2.2.1. Policies related to value chain workers (S2-1)

In recent years, Navigator has developed policies and other guidance documents which address its value chain in its various dimensions, ensuring that Navigator's health, safety and environmental standards are maintained, and also compliance with legislation and other applicable guidelines.

One example of these documents is the Service Providers Management Handbook, which sets out the Occupational Health and Safety and Environmental rules, applicable in Navigator operations. This handbook includes requirements for the process of contracting suppliers so as to comply with legal and other requirements; it minimises the exposure of workers, facilities and the environment to the risk of possible work-related accidents; it promotes the use of good practices and safe working methods in the execution of services; it promotes the use of good environmental practices, to be complied with by all Service providers in Navigator facilities, with a view to environmental protection, mitigating any impacts resulting from their activities; it informs service providers of the criteria to be considered in their performance assessments.

In line with our governing principles, we are committed to encouraging responsible conduct throughout our value chain. In addition to the Service Providers Management Handbook, Navigator has a series of policies which apply to value chain Workers: Human Rights Policy; Codes of Conduct for Suppliers; Major Accident Prevention Policy; Management Systems Policy; Forestry Policies. These documents apply to all those working throughout our value chain. In addition, as a complementary document, we can point to the Guide to Good Practices for Service Providers and Casual Workers, which establishes principles, rights and duties duly aligned with ILO Performance Standard 2 - on the elimination of forced or compulsory labour. This document is specifically aimed at Forestry Service Providers and Casual Workers recruited in the Communities where Portucel Moçambique operates. [ESRS 2.65a | S2.16]

In developing these policies, due consideration was given to inter-governmental reference documents, including the United Nations Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labour Organisation and the OECD Guidelines for Multinational Enterprises, in addition to the ISO standards which underpin our Management Systems Policy. [ESRS 2.65d | S2.19]

Our Human Rights Policy makes specific commitments with regard to value chain Workers, in particular: encouraging the different levels in The Navigator Company's value chain to respect Human Rights and employment rights, in particular through appropriate contractual provisions that encourage the adoption of the necessary preventive and corrective measures and transparent treatment of information concerning any violations of Human or employment rights, as well as assessment of its compliance on these matters. This commitment is set out in the responsibilities assignment matrix associated with the governance model in the Human Rights Policy.

The Code of Conduct for Suppliers also refers to Workers in the value chain, in particular [ESRS 2.65a | S2.16 | S2.17 | S2.18]: (1) compliance with applicable laws and regulations; (2) respect for and promotion of Human Rights; (3) non-discrimination; (4) working hours; (5) health and safety; (6) freedom of association and collective bargaining; (7) environmental practices.

With regard to respect for and promotion of Human Rights, we may note that Navigator respects universal Human Rights in its operations and promotes implementation within its sphere of influence, so it expects its Suppliers to do the same. The Code sets out the prohibition of child or forced labour of any kind, respect for personal dignity, privacy and the personal rights of each individual which must be respected and also states that none of the Workers of Navigator's Suppliers must be subject to physical punishment or abuse, or to physical, sexual, psychological or verbal harassment. [S2.17 | S2.18]

In order to strengthen this commitment, we have implemented a Third Party Vetting System. We now include compliance clauses in contracts with Suppliers, through which we ensure adoption of several criteria - in particular on anti-corruption and related

offences issues, prevention of money laundering and terrorist financing, compliance with international sanctions, including, among other requirements, protection of Human Rights.

In addition, through its Modern Slavery and Human Trafficking Statement, Navigator Tissue UK highlights the Company's commitment to human rights and ethical practices throughout the value chain. In this context, the company requests information from its suppliers on their ethical trading systems and practices, ensuring alignment with the commitments set out in the Statement. [S2.18]

Also in connection with this, it should be noted that no cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises were reported through the channels provided for this purposes, involving value chain Workers. [S2.19]

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Presentation of Human Rights Policy and Codes of Conduct for Suppliers (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.4.1
- Presentation of Management Systems Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Cap.5.2.5
- Presentation of Serious Accidents Prevention (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.3.1
- Presentation of Forestry Policies (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.6

5.3.2.2.2. Processes for engaging with value chain Workers about impacts (S2-2)

Engagement with value chain Workers is essential for taking action to generate positive impacts and mitigate potential negative impacts. This engagement is particularly important when the Workers perform duties comparable to the Group's own operations, such as industrial operations and/or operations in forestry sectors.

OHS issues are a priority for Navigator. The Company's **internal OHS programme** includes engagement with value chain Workers. These Workers must adopt the occupational safety practices established by the Company and comply with the established standards and regulations. In addition, they must take part in Navigator **safety training**, which address safety requirements specific to the Company, as well as in external training activities. [S2.22a]

In addition, we have a **Whistleblowing Channel** and we conduct **Worker consultations** (see following section). [S2.22a]

At this time, Navigator has no global framework agreements or agreements with global union federations relating to the Human Rights of value chain workers. [S2.22d]

5.3.2.2.3. Processes to remediate negative impacts and channels for value chain Workers to raise concerns (S2-3)

The material negative impacts identified, for value chain Workers, are related to health and safety. The general approach to providing for or contributing to remediation of these material negative impacts is based on a **structured process of accountability and continuous improvement**, in which the following processes are implemented. [S2.27a | S2.33a]

- **Penalty procedure and declassification of accidents** [repudiation of responsibility] – whenever a Service provide causes or contributes to a significant negative impact, a corrective action plan is required, which must be implemented by that Service Provider and overseen by the Navigator team. [S2.33b | S2.23]
- **Monitoring and assessment of implementation** – the Navigator team monitors implementation of corrective measures in order to ensure that the causes of the incident are properly addressed and are not repeated. [S2.33b | S2.23]

- **Assessment of effectiveness of corrective measure** – if the action taken does not prove effective, the Provider may be suspended or excluded from the list of qualified Providers, ensuring that only Partners omitted to safety are permitted within the value chain. [S2.33b | S2.23]

In Mozambique, the first approach implemented is to ensure that external Workers, especially casual Workers (including both those hired by Service providers and those hired directly) have inclusive, fast and efficient two-way communication channels with Navigator.

We have a **complaints management procedure** enabling us to monitor and assess each situation individually, and a complaint is deemed resolved when the complainant signs the document agreeing with the solution presented. In the case of casual field Workers, complaints can be submitted through Technical Staff or the **Community Liaison Officers** (Chap. 5.3.3) (through the complaints management procedure for Local Communities, insofar as these Workers are persons resident in the Local Communities), who, in turn, forward them to the Company through the **Communication Officers**, for analysis at resolution at Management level. This ensures remediation of negative impacts and assessment of the effectiveness of the processes implemented. [S2.27a | S2.23]

In Portugal, we conduct an **annual consultation** with external Workers on **OHS issues**. An anonymous online questionnaire is used to identify strong points and development needs in Navigator's OHS sector. [S2.27a | S2.22e]

In addition, the Group has a **Whistleblowing Channel** (Chap. 5.4.1) which enables value chain Workers to report all or any issue or concern they may have. Personal data is processes confidentiality and anonymously, ensuring protection any kind of reprisals which might occur. [S2.23]

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Further information on the tracking and monitoring of questions raised and addressed and ensuring the effectiveness of the Whistleblowing Channel (S2.27d): Chap. 5.4.1.

5.3.2.2.4. Take action on material impacts on value chain Workers, and approaches to managing material risks and pursuing material opportunities related to value chain Workers, and effectiveness of those actions (S2-4)

We focus our efforts on providing training, disseminating good practices and conducting safety inspections (see following table), in order to prevent, remediate or correct the material negative impacts on value chain Workers. [S2.32a | S2.32b | S2.32c | S2.32d]

On-the-job training (forestry operations) is provided for external Workers, addressing environmental and social issues. We provide information on mitigation measures to be adopted in relation to the environment, as well as the OHS requirements applicable to the operations in question. [S2.31 | S2.22e | S2.35]

In relation to the **dissemination of good practices to operation and transport companies**, efforts are jointly organised with external Partners, including Forestry producers organisations and forestry and chain of custody certification groups. These initiatives are related to safety in execution of forestry operation and transport operations, encompassing Wood suppliers. [S2.31 | S2.35]

Safety inspections of work fronts consist of visits to the various work fronts, with the prime objective of managing the Safety risk. These are monitoring visits to the different work fronts in forestry operations, in order to assess compliance with standards and the use of equipment (emergency and other), leading to awareness raising/training for task forces - mostly Workers from local Communities, on a range of health and safety issues. [S2.31 | S2.33a | S2.33c | S2.22e | S2.35]

Main actions: [ESRS 2.68a]	Status [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.68a | ESRS 2.68e]
On-the-job training (forestry activities)	Executed and planned	Own and upstream operations, with impact on Workers of Service providers in forestry activities, in Portugal and Mozambique	Ongoing action	In Portugal, in 2025, this reached 232 Workers of Service Providers in forestry activities, corresponding to 248 training hours. In Mozambique, it reached 1128 Workers of Service Providers in forestry activities, corresponding to 409 training hours.
Dissemination of OHS good practices to operational and transport companies	Executed and planned	Downstream operations, with impact on Workers of Wood suppliers, in Portugal	Ongoing action	In 2005, this reached 205 Workers of Wood supplier companies, corresponding to 820 training hours.
Safety inspections of work fronts	Executed and planned	Downstream operations, with impact on Workers of Forestry service providers and Communities in the areas where we operate, in Mozambique	Ongoing action	Visits to work fronts in order to assess potential non-conformities in the different forestry operations (in connection with Safety). 542 work front assessments were conducted. 4039 training hours were provided, reaching approximately 2536 people,. including own Workers, Service providers and Communities.
Forestry SafePro	Executed and planned	Own and upstream operations, with impact on Workers of Service providers in plant production and forestry activities, in Portugal	2025-2026	This action envisages that 100% of external Workers are trained for the work to be carried out at Navigator. This is also the measure we have planned for providing solutions for persons negatively affected by real material impacts. [ESRS 2.68d]
Raising awareness of safety issues among logistics and inbound transport Suppliers and Workers.	Executed and planned	Own and upstream operations, with impact on Workers of Suppliers, in Portugal	Started in 2025, ongoing	Raising awareness of the use of PPE and compliance with safety procedures at the gates to mills, woodlands and wood yards, reaching 290 Workers from 95 companies.
Pre-shutdown safety induction	Executed and planned	Upstream operations, with impact on External Workers at production sites, in Portugal	Ongoing action	In-person awareness raising with all external Workers prior to access to sites for work on shutdowns.

Execution of the actions set out in the previous table, in 2025, does not require significant capital expenditure (CapEx) or operational expenditure (OpEx), except in the case of the Forestry SafePro action. The Corporate OHS Budget was allocated to this action and expenses relating to fire-fighting equipment engineering structures and solutions, and other adaptations in the safety area were considered, as presented in the table below [ESRS 2.69b | ESRS 2.28]

Financial resources	Unit	Value
Current CapEx [ESRS 2.69b]	M€	4.01
Current OpEx [ESRS 2.69b]	M€	2.27
Future CapEx [ESRS 2.69c]	M€	4.1
Future OpEx [ESRS 2.69c]	M€	2.19

In addition to the actions identified above, work has continued on the Advance Forest Project for advanced training for Forestry Officers, Producers and Owners, in a partnership with Biond and Ascendum Máquinas. [S2.32c]

With execution of the actions adopted, as well as others already implemented or due for implementation under Mission Zero, the aim is to reduce the probability of the occurrence of incidents, with the aim of eliminating work-related accidents and occupational diseases. The effectiveness of the actions implemented is assessed through monitoring of specific metrics, such as the frequency index, and also the targets related to impacts on external Workers, where progress is monitored regularly (see following section). [ESRS 2.68a | S2.32d | S2.33c]

In connection with Human Rights, the action taken by Navigator along the value chain is based on the commitments established in the Human Rights Policy and the Code of Conduct for Suppliers, through preventive, contractual and monitoring procedures. In 2025, no serious issues were reported in relation to Human Rights, or any incidents related to our value chain, upstream or downstream. [S2.36]

The following information is incorporated by reference to other parts of the Annual Report:

- Further information on the relationship between the current financial resources allocated to these actions or action plans and the most significant figures in the financial statements (ESRS 2.69b): Consolidated income statement in Annual Report.

5.3.2.3. Targets and metrics

5.3.2.3.1. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5, MDR-T)

In our 2030 sustainability Roadmap (Chap. 3.4.4), we have defined several targets with a view to reducing the negative impacts on Workers and promoting the positive impacts identified as material [S2.39 | ESRS 2.80c]:

- **Reduction of frequency indexes for work-related accidents** in Iberia and Mozambique, with target values which include Navigator Employees and external Workers
- **Reduction of accidents declassified as work-related due to non-compliance with rules and procedures**, with target values which include Navigator Employees and external Workers
- **Provision of training courses on a continuous basis in OHS** in forestry operations for Service providers, Suppliers and actors in the sector.

In the wider sustainability context, it may be noted that these targets contribute to SDGs 8 and 3, seeking to promote safe and healthy working conditions, improving the welfare of Workers in the value chain. [ESRS 2.80f]

These targets are aligned with the Safety Policy integrated into our Management Systems, in particular with the commitments to promote safe and health working conditions, on a continuous improvement basis, preventing work-related injuries and diseases and fostering Worker consultation and participation, at the same time as providing for their personal and professional development. They are also aligned with the Major Accident Prevention Policy, which defines functions, responsibilities and powers, ensuring information and/or training is provided to internal Employees, Suppliers, Service providers and other Stakeholders. They are also linked to the Forestry Policy in connection with the commitment to "ensure the health and safety of our Employees, including that of the Employees of third parties providing forestry services, offering them appropriate training/information for the risks assessed". [ESRS 2.80a]

It is stressed that external Workers receive training and information on rules and procedures, and are also subject to a system of penalties in the event of non-compliance with the rules, standards and/or procedures (cardinal rules).

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Further information on targets for reduction of frequency indexes (Iberia and Mozambique) and percentage of accidents declassified as work-related due to non-compliance with rules and procedures (MDR-T, ESRS 2.80): Chap. 5.3.1

Goal and target	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
Provide training courses on a continuous basis in OHS in forestry operators for Service providers, suppliers and operators, aiming to provide more than 600 hours each year.	Base Value: 628 h 457 Workers Baseline: 2021	No. of people involved No. of training hours	698 hours 567 Workers	655 Workers of Service providers, Suppliers and sector actors, making a total of 2434 hours of training/dissemination of good practices (Portugal). 1382 Service provider and casual Workers, making a total of 89 hours of safety training (includes classroom training, training in the field and awareness raising in safety inspections conducted on work fronts) (Mozambique). Total: 2037 Employees and 2523 training hours	904 Workers of Service providers, Suppliers and sector actors, making a total of 3403 hours of training/dissemination of good practices (Portugal). 2989 Service provider and casual Workers, making a total of 5049 hours of safety training (includes classroom training, training in the field and awareness raising in safety inspections conducted on work fronts) (Mozambique). Total: 3893 Employees and 8452 training hours.	Results to achieve: 600 h/year Year: 2030

Stakeholders were not involved in setting the target. [ESRS 2.80h]

The target is monitored on the basis of the number of training hours and the number of participants involved (absolute values). [ESRS 2.80b]

The target presented relates to the continuous provision of OHS training courses in forestry operations, aimed at Service providers, Suppliers and actors in the sector [ESRS 2.80c], encompassing: [ESRS 2.80f]

- No. of Workers of Service providers in forestry activities (in Portugal) and respective training hours provided on work front;
- No. of Workers of Wood suppliers, in forestry operation and transport activities (in Portugal, and respective hours of dissemination of good practices;
- No. of actors in the sector (Forestry Officers and Landowners in Portugal) and respective hours of dissemination and demonstration of good practices and innovation in forestry;
- No. of Service provider and casual Workers in forestry activities (in Mozambique) and respective training hours provided;

In addition, it should be note that these actions are carried out in collaboration with external Partners, with content designed by the Company, in order to ensure promotion and dissemination of good practices, aligned with its sustainability principles and commitments. [ESRS 2.80f]

The effectiveness of the target is assessed on the basis of the management indicators, with a base period of three years. [ESRS 2.80j] In 2025, there was a significant increase in participation in actions to disseminate good practices, resulting in a notable rise in the number of Workers of Suppliers and actors in the sector reached, as well as in the total training hours. This tendency could have future implications for the setting of new targets, requiring analysis to determine whether this is a permanent change or a one-off effect. [ESRS 2.80j]

5.3.2.3.2. Entity-specific metrics (MDR-M)

In addition to the metrics associated with the target presented above, an entity-specific metric has also been established: the frequency index. [ESRS 2.77c]

The frequency index for work-related accidents was calculated by counting accidents leading to sick leave and using a normalisation factor for hours worked of 1,000,000. [ESRS 2.77a]

[ESRS 2.75 – Entity-specific metrics]

Frequency Index	2025	2024
Portugal and Spain		
Frequency index	2.5	3.1
No. accidents leading to sick leave	15	20
Mozambique		
Frequency index	0	0.3
No. accidents leading to sick leave	0	1

Note: These indicators refer to external Workers [ESRS 2.77a]

5.3.3. ESRS S3: Affected Communities

5.3.3.1. Strategy

5.3.3.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Description [ESRS 2.48a]	Impact, Risk or Opportunity [ESRS 2.48a]	Time horizon [ESRS 2.48ciii]	Location in value chain [ESRS 2.48a]	Sub-topic or related sub-topic [ESRS 2.48h]
Promotion of the local economy, territorial cohesion and retention of population (for example, in inland regions) due to creation of decent jobs, improved infrastructure, investment in social welfare and ensuring respect for the cultural and environmental rights of Communities, contributing to better living conditions and balance development in the regions.	Positive impact	--	Own operations	Economic, social and cultural rights of Communities
Promotion of SDGs 1 and 2 with impacts on Communities in Mozambique where the Company operates, improving their welfare.	Positive impact	--	Own operations	Economic, social and cultural rights of communities - Adequate food
Promotion of access to drinking water by local Communities in Mozambique.	Positive impact	--	Own operations	Water withdrawal - Water and sanitation

NB: the material impacts identified are actual, and so there is no associated time horizon.

We have a significant presence in several regions, with industrial operations in Portugal, Spain and the United Kingdom and a forestry base in Portugal, Galicia (Spain) and Mozambique. In line with our Purpose (Chap. 2.1), we have accepted a responsibility to find effective ways to **share value with our Stakeholders** (Chap. 3.4.5), paying special attention to local Communities. These play a fundamental role in interactions with companies, as they are the first link in the chain to feel the impacts of our forestry and industrial activities.

In the light of our double materiality analysis, we identified several positive **material impacts** on the Communities affected by our operations, which are aligned with our strategy and business model, in which we set out to create long term value, contributing to the **rural economy**, through development of the regions where we operate and improving the woodlands we manage. [ESRS 2.48a | S3.8a-i] No material **risks and opportunities** were identified for Navigator resulting from the impacts and dependencies in relation to the affected Communities. [S3.9d]

By investing in **infrastructures, we foster other forest-based economic activities**; and by **contracting and training talent** drawn from local Communities, and running the **development programmes**. we contribute to social welfare and regional development. [ESRS 2.48a | S3.8a-i]

Alongside this, the implementation of sustainable management initiatives - such as forestry conservation, promotion of active Community participations, free technical support and the training we provide for Forestry producers (Chap. 5.2.6), contracting of local service providers for forestry activities, ongoing infrastructure maintenance (network of forest roads) and prospecting and developing business opportunities in the context of multiple forest uses, among other things - enables us to improve management practices, boosting the yields of products extracted from the forest. These factors strengthen the local economy, generating

employment and creating conditions which help retain the population in the countryside, whist respecting local cultural and environmental values and contributing to the sustainable development of regions. [ESRS 2.48a | S3.8a-i]

We believe that sharing with society should not be limited to just our results, but should also include our **know-how, experience and resources**. Strategic partnerships with academic, institutional and community bodies promote know-how transfer and innovation (Chap. 3.4.5), and are important factors in improving territorial cohesion, as well as fostering the creation of economic value by integrating the Community in the value chain of the circular bioeconomy, improving the **quality of life** and **resilience of local populations**. [ESRS 2.48a | S3.8a-i]

The Navigator Company has several projects working to this end, centred on Education and Communication in the field of Forestry, Biodiversity and the forest-based Bioeconomy, such as Give the Forest a Hand, Forest of Wisdom, Florestas.pt and Biodiversity by The Navigator Company. In addition, with a view to close Community ties, the Navigator Tour programme takes visitors around our mills, RAIZ and the nurseries in Portugal, enabling people to share experiences, knowledge and values.

Thanks to a robust strategy of dialogue and direct engagement with Communities, we seek to take action that contributes to socio-economic and environmental development on a sustained basis. In the case of our forestry operations in Mozambique, which are linked to positive impacts associated with SDGs 1 and 2 and access to drinking water, one of our aims is that the project should lead to **sustainable development of Communities**, in view of the considerable interaction within the Mosaic Model, where plantations co-exist sustainably and harmoniously with Communities and all the related forms of land use, such as areas of high conservation value, farmland, houses, areas for social and religious use, and all other areas designated by Communities. This means that the sustained development of the project is only possible with a closely interwoven relationship, ensuring respect for Communities' expectations and needs.

The **Social Development Programme** has been implemented in Mozambique and new lines of action have emerged, based on the impacts of activities and the respective implementation methods, leading to adjustment of development strategies in order to achieve greater efficiency and impact. One example is the work to repair boreholes drilled by other organisations, which had not been envisaged at the start of the Programme, but which has been undertaken on the request of Communities, and currently has a significant impact on their welfare - 68 boreholes repaired and operational and 46 newly drilled. [ESRS 2.48a | S3.8a-i]

The Company identifies and assesses the impacts on the Communities where it operates, using this information to adjust its strategy and business model, promoting creation of shared value and ensuring that its operations respect Communities' rights and customs, through initiatives that foster social and environmental benefits. [S.38a-ii]

The disclosures in this report are focused on the **affected Communities**: (i) in the **vicinity of forestry operations** in the **Iberian Peninsula** – Communities and local entities that benefit from the impacts generated by forestry activities; (ii) **in the vicinity of forestry operations in Mozambique** – Local Communities and local entities which benefit from the impacts generated by forestry activities (employment generated by the need for manpower) and by the implementation of the Social Development Programme, which provides benefits at family level and for Communities, improving food security and diversity, boosting income generation and improving welfare in the fields of health and education; (iii) in the **vicinity of industrial facilities** – Local Population, Municipalities, Civil Parish Authorities, local entities, Non-Governmental Bodies and Universities. [S3.9a]

5.3.3.2. Management of impacts, risks and opportunities

5.3.3.2.1. Policies related to affected Communities (S3-1, MDR-P)

We have adopted a series of policies which reflect our commitment to the Communities involved in our operations, paying special attention to the rights of local populations. We may point here to: the **Code of Ethics and Good Conduct** and the **Human Rights Policy** - applicable across our Organisation and extending to other parties with whom we have dealings; the Forestry

Policies for Portugal and Mozambique; and, in the context of Portucel Moçambique, the **Community Engagement Policy** and **Portucel Moçambique's Social Development Programme**.

These policies are aligned with widely recognised international instruments, such as the United Nations (UN) Guiding Principles on Business and Human Rights, setting out how business should work to respect and promote Human Rights. In this way we ensure that our practices comply with those principles, implementing measures that ensure protection and respect for Communities and for their rights, including consultation and active engagement with local people in managing the impacts of our operations. [S3.17-1]

With this focus, we have embraced our social responsibility to the Communities where we operate, in order to contribute to their advancement and welfare, as laid down in Article 18 (Social Responsibility and Sustainable Development) of our Code of Ethics and Good Conduct (Chap. 5.4.1). We have implemented a Human Rights Policy (Cap. 5.4.1), where we set out our commitment to: (i) promoting Community engagement in order to obtain feedback on Human Rights and labour rights issues, recognising the importance of listening and ongoing dialogue in order to incorporate local concerns in our internal decision-making processes; and (ii) acting in such a way as to respect Human Rights in Local Communities, including, where applicable, indigenous peoples, and adopting measures to minimise negative impacts, and to protect their values, culture and traditions. [ESRS 2.65a | S3.15]

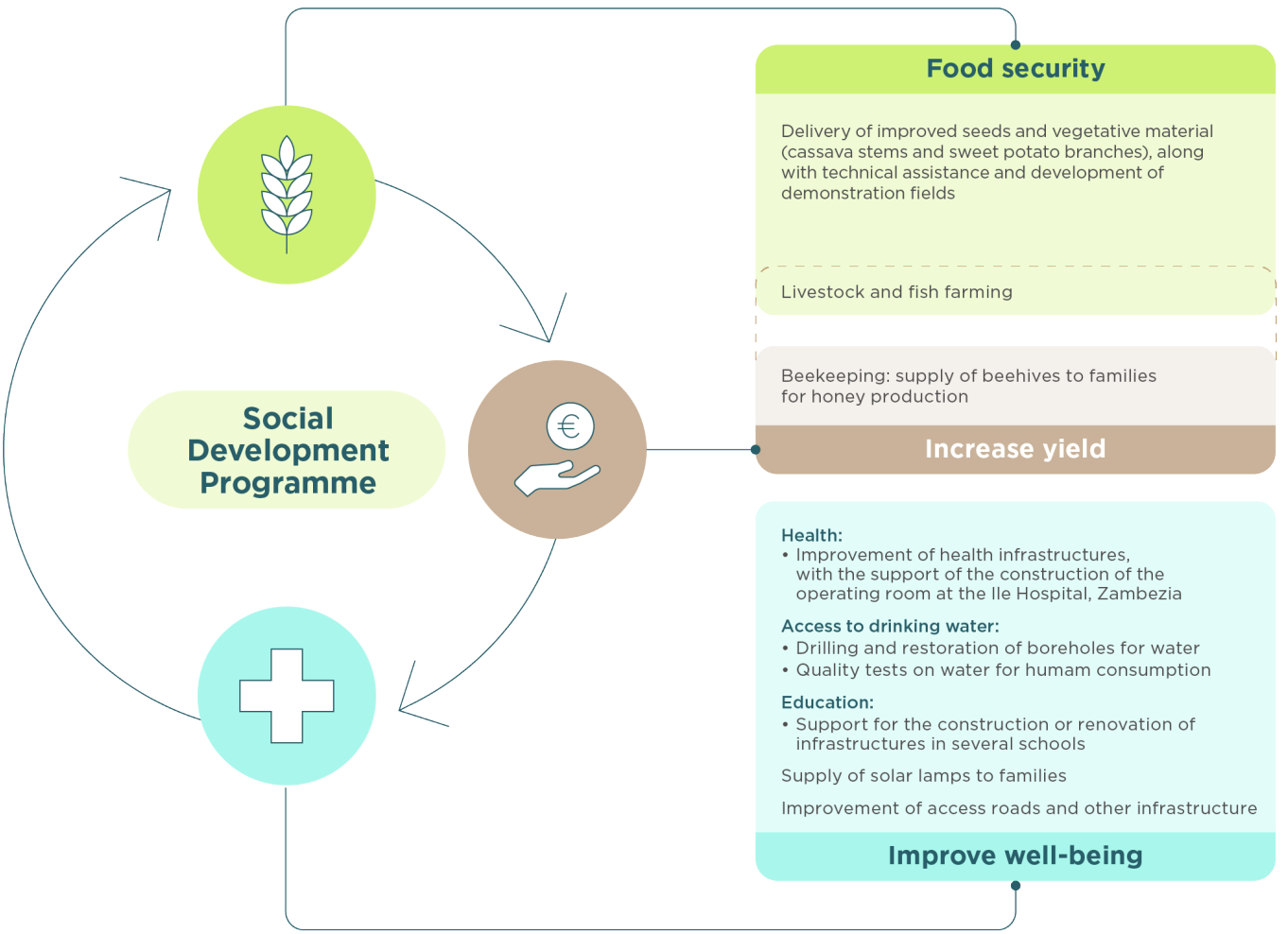
It should also be noted that, because the forest is our prime source of resources, we also have Forestry Policies in Portugal and Mozambique (Chap. 5.2.6). One of the priorities established involves educating the public about the benefits of woodlands and the importance to society of sustainable use of forest-based products. These policies laid down two principles that underline our commitment: (i) to maintain and improve responsible management of woodlands, in a balance with their natural and social surroundings, developing and promoting actions, including with third parties, that ensure that deforestation or degradation are avoided and/or that forests are conserved; and, (ii) to be ready to listen and respond to issues raised by stakeholders, to make its Forestry Policy public, to work towards a relationship with local communities that reflects high standards of social and environmental responsibility and to comply with the principles of the International Labour Organisation. These commitments are guaranteed, in Portugal, by application of procedures DGF N8 (Use of Land), DGF S9 (Stakeholder Communication) and DGF S10 (Contracting of Goods and Services) and, in Mozambique, by the Relationship Management Procedure and the Social Development Programme, detailed below. In applying its Forestry Policy in Portugal, Navigator undertakes to comply with the requirements of Portuguese Standard PEFC - NP 4406 on Sustainable Forestry Management and with the Principles and Criteria of the FSC, enabling it to help preserve wildlife and ecosystems, to promote soil formation and combat erosion, to protect the forest against fires and to regulate the water cycle, attaching vale to land use that encourages territorial cohesion and wealth creation. [ESRS 2.65d]

The Community Engagement Policy developed for Mozambique is a fundamental pillar of our Corporate Social Responsibility. This policy reflects our commitment to cooperate, engage in dialogue and support Communities in the areas close to our forestry areas, so as to build lasting and inclusive relationships, based on transparency and mutual respect between the parties, in a context in which we seek to contribute to sustained socio-economic development. [ESRS 2.65] Portucel Moçambique’s dealings with local Communities are based on dialogue and regular implementation of the following principles: (i) to work proactively to secure the engagement of all the main stakeholders; (ii) to respect all the rights, traditions and cultural heritage of Communities, working at all times within the framework of national legislation and respect for Human Rights; (iii) to secure proactive engagement, with a view to effective communication, on the basis of informed and participative consultation; (iv) to create opportunities for socio-economic development in Communities, through the employment generated in forestry operations and the activities of the Social Development Programme (SDP); (v) to comply with labour legislation, and also to promote gender equality in access to employment opportunities and to the SDP; (vii) to defend Community interests against any corrupt practices; (viii) to provide a Relationship Management Procedure, so that any individual or organisation can gain a hearing, ensuring they are protected against any reprisals, (ix) raising Community awareness of the benefits of adopting good environmental practices..

Committed to Community engagement in pursuing its plans, Portucel Moçambique has run the Social Development Programme (SDP), in order to contribute to the sustained socio-economic development of Communities. [ESRS 2.65] The SDP was set up in response to some of the specific risks to Communities identified in the Environmental and Social Impact Assessment (ESIA) conducted between 2011 and 2013. The ESIA identified a baseline scenario where some 24 thousand households in the project

implementation areas presented high rates of food insecurity, low income, low agricultural yields (e.g. manioc, maize), poor access to drinking water, among other issues. The ESIA provided an objective basis for establishing the three priorities of the SDP, which seek to minimize these risks - improved food security, incentives for income generation and improved welfare of Communities.

Document	Community Engagement Policy
Key content and goals [ESRS 2.65a]	Portucel Moçambique's relationship with local Communities is based on dialogue and on implementing an inclusive, long-term relationship, based on transparency and mutual respect between the parties involved, in a context where we seek to contribute to sustained socio-economic development.
Scope [ESRS 2.65b]	Applies to own operations and the Group's entire value chain, involving Employees and Stakeholders - Government, Civil Society and Local Communities. Applies to the geographical region of Mozambique.
Most senior level responsible for implementation [ESRS 2.65c]	Executive Committee of Portucel Moçambique
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	Universal Declaration of Human Rights and ILO Conventions
Availability [ESRS 2.65f]	Furnished to all Employees and materially relevant Suppliers and in all market consultation procedures. Available on Intranet pages, the website and online Employees are also given training in this matter.



Document	Portucel Moçambique Social Development Programme
Key content and goals [ESRS 2.65a]	Portucel Moçambique is committed to involving Communities in pursuing its project in Mozambique, in a context where is seeks to contribute to sustained and inclusive socio-economic development.
Scope [ESRS 2.65b]	Applies to own operations and the Group's entire value chain, involving Employees and Stakeholders (Government, Local Communities and Civil Society). Applies to the geographical region of Mozambique.
Most senior level responsible for implementation [ESRS 2.65c]	Board of Directors
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	Universal Declaration of Human Rights and ILO Conventions
Availability [ESRS 2.65f]	Furnished to all Employees and materially relevant Suppliers and in all market consultation procedures. Available on Intranet pages and website. Employees are also given training in this matter.

It is noted that no significant changes were made to the policies adopted during the reporting year. [AR9]

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Presentation of Code of Ethics and Good Conduct (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.4.1;
- Presentation of Human Rights Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.4.1;
- Presentation of Forestry Policy (MDR-P, ESRS 2.65 a/b/c/d/f): Chap. 5.2.6.

5.3.3.2.2. Processes for dialogue with affected Communities about impacts (S3-2)

At Navigator, we have made a commitment to engaging with national, international and local Community institutional Stakeholders, listening to their expectations and aligning them with Navigator's strategy and needs. To that end, we use various forms of communication and engagement, and the channels and frequency vary depending on the Stakeholder group and the needs identified. [S3.21]

The formal mechanisms for direct interaction with different Stakeholder groups include the bilateral communication channels established, such as the **Community Liaison Committees, the Community Relations Management Procedure and regular contacts with stakeholders in relation to forestry activities**. In addition, we organise the **Sustainability Forum** (Chap. 3.4.5), an arena for dialogue that meets twice a year. One of the two sessions has a regional flavour, in order to bring us closer to local Communities and to harness cooperation between Navigator and the various municipalities where we carry on our operations. In this way we seek to consolidate **trusting relationships and our social license to operate**, increasing **transparency** and identifying possible **risks and opportunities**.

Complementing this, we run other initiatives seeking to foster close ties with Communities, such as Navigator Tour, which enables local people to see for themselves how we work and operate at the mills, at RAIZ and in our nurseries. [S3.21 | S3.21d]

Since its creation in 2020, the Forest of Wisdom (a joint The Navigator Company/RAIZ project) has contributed for forest literacy and an understanding of forestry issues among future generations. This project has been funded by the Sustainable Development programme of the Calouste Gulbenkian Foundation and has been recognised by UNESCO Portugal, for its alignment with several of the Sustainable Development Goals (SDGs) in the United Nations 2030 Agenda.

With visits open to the general public and practical activities for the school community in a forest and laboratory setting, the Forest of Wisdom has made a real contribution to Forestry Education. This project works with the school community (with several school groupings) and municipalities (for example, Aveiro, through PAEMA), complementing the educational programmes in place and contributing to forestry education, sustainability and the forest-based economy.

Since it started, the project has reached more than 43 thousand students at pre-school, primary, secondary and university level, in several districts of the country, and organised more than 2500 activities. During 2025,the project impacted 12 872 people (mostly students and teachers) and organised around 600 activities.

It should be noted that Navigator has no operations in geographical regions where indigenous peoples are present. Even so, the Company’s commitment on this matter is set out in its Human Rights Policy, item 2. g). [S3.23]

Community Monitoring Committees (CMCs)

The Community Monitoring Committees (CMCs) have been set up in the **areas around the Company's industrial complexes in Portugal**, in particular in Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão. These meetings, held in the area around each of Navigator's industrial units, are of great importance in understanding the concerns of local Communities, seeking to respond to their needs and forge close ties between the Company and these Communities. [S3.21 | S3.22]

Two meetings are held in each of Navigator's four industrial complexes - in the 2nd and 4th quarters. [S3.21d] The Committees are headed by a Chairman (a prominent figure from outside Navigator), and involve representatives of Navigator's directors and sectors such as Public Affairs, Industrial, Environment and Circularity, Human Resources and Sustainability, and a variety of stakeholders - representatives of Municipalities, local organisations, Non-Governmental Organisations, Universities and others. [S3.21 | S3.21d | S3.22]

The interaction generated at the CMC meetings facilitates joint reflection on matters relating to the life of the Communities, and the feedback from CMC members is recorded in minutes for subsequent follow-up by Navigator's internal departments. These entities are subsequently informed of the progress/results of the initiatives undertaken. [S3.21 | S3.22]

A variety of topics are addressed, notably industrial development projects focusing on decarbonisation, environmental performance, environmental and forestry investments, sustainability strategy and the social context and human development, among others. The environmental presentations also involve analysis of the main environmental indicators (notably atmospheric emissions and liquid effluents), as well as other types of issues, complaints and the environmental inspections made at each site. All topics are presented with complete transparency, and then jointly analysed and debated, and minutes are then drawn up, approved by the parties involved and enabling strict monitoring of the progress made on the various subjects addressed.

There is also a question and answer session at each meeting, involving open dialogue between participants. This active voice on topics of concern to Communities, which can range from the impacts of the Company's activities (environmental and social) to projects, is able to contribute to the improved welfare and quality of life of local people. [S3.21d | S3.22]

We can also point to the institutional cooperation entailed in the Figueira da Foz CMC, involving the two pulp & paper companies operating in the region (Navigator and Celbi), in a joint effort to build ties with local stakeholders. Within this framework, both companies seek to work with the civil parish authorities in supporting communities and local organisations. All these actors take part in the CMCs, where they are able to voice their concerns and make suggestions for improvements, around the table with representatives of the two companies, who cooperate in finding solutions for the issues raised. [S3.21]

Navigator has a specific mechanism for assess the effectiveness of its dialogue with affected Communities. A short questionnaire was designed in 2024, optional and anonymous in character, seeking to measure the perception of local Stakeholders concerning the quality and usefulness of the interaction process; the findings were presented in 2025. The purpose of this instrument is to arrive at a more thorough understanding of Community expectations and concerns, to align the dialogue agenda with their priorities and to achieve greater effectiveness and transparency in managing institutional relations. Whenever issues are raised or clarification requested, the Company seeks to reply immediately during the session or, when this is not possible, through subsequent direct communication. This approach has made it possible to identify opportunities for improvement, to adjust practices and strengthen mutual trust in the relationship with Communities.

Communities Relations Management Procedure in Mozambique

By setting up the Community Relationship Management Procedure, Portucel Moçambique has reaffirmed its commitment to seeking a balanced and fair relationship and to contributing to the development of Communities and families in the geographical areas covered by its project. The Procedure offers a channel for **receiving, analysing and responding to the issues raised by Stakeholders**. Portucel Moçambique sees this Procedure as a tool for managing issues of potential or actual conflict, but also as a tool for assessing the interconnection between the project and the Community and, accordingly, for a better understanding of where to improve and refine its practices. [S3.21d]

The Community Relationship Management Procedure is a suitable tool for projects with the potential for environmental and social impact, because it defines the interlocutors and formats the Company should use for conducting its dealings with Stakeholders, so that information, suggestions and/or complaints are assessed and followed effectively by both parties (the Company and Communities/families), ensuring that Communities and families have the advance information they need to reach a free and informed decision on the issues common to both parties (FPIC-Free, Prior and Informed Consent). This procedure is shared with

IFC (International Finance Corporation, World Bank), in connection with its Performance Standards, which recommend that, in projects with significant and potentially adverse impacts for Communities, Stakeholder engagement be secured on the basis of informed and participative consultation and that a Community Relationship Management Procedure be established. [S3.21]

Implementation of this Mechanism offers several advantages. In addition to managing a balanced and fair relationship, it serves as a tool for monitoring and assessing the project, making it possible to arrive at conclusions and deductions for improving the respective systems and processes. At the same time, it is a tool for transparent accountability to Communities and other Stakeholders, given that, periodically, the Company will publicly report on its work in managing relationships and welfare initiatives. [S3.21d]

There are several strategies for implementing this interaction, such as community meetings, "village meetings" (in specific localities), "door to door" visits and the regular presence in the Communities of the **Community Liaison Officers (CLOs)**. [S3.21d] The Community Liaison Officers (CLOs) are designated by the Community and supported by Portucel Moçambique, and form a bridge for communication between the Company and the families of one or more Communities. The Community Liaison Officers (CLOs) speak the local languages, which helps in including all the participants and ensures clear communication at the Company's regular meetings with the Community and families. They interact regularly with Portucel Moçambique's team of Communication Officers, in order to manage relations with the Communities more broadly and to coordinate and plan the work to be done, ensuring that a consistent line is taken in all community communications. The CLOs and the Communication Officers receive regular training, in particular in topics such as Human Rights, non-discrimination on the basis of sex or age, avoiding corruption and other issues. They also receive technical training in the use of equipment and software for better communication. Both the Liaison Officers and the Communication Officers, together with any Company Employee, are possible points of contact for the Relationship Management Procedures, which anyone can access and enables the company's stakeholders, and especially members of local Communities, to voice complaints, suggestions or other concerns, in their daily dealings with the Company.

The values and principles underlying this Procedure include equal access, irrespective of social, racial or cultural status or physiological characteristics. Non-discrimination principles are practices in the Company's different activities, in connection with both employment and relationships with Communities/families.

For example, in view of cultural characteristics, the Community Environmental Awareness Raising Programme includes meetings organised only with women, in order to give them a voice and obtain better feedback on the specific issues for these events. [S3.22]

The effectiveness of the Communities Relationship Management Procedure in Mozambique is assessed through ongoing monitoring of the number of complained recorded and resolved over time, and also tracking of the action plan established at meetings with the Communities.

Although specific surveys are not conducted after each meeting, there is always space for Community members to raise their concerns. All issues raised and the respective responses are duly recorded in the report of each meeting, for which the respective template includes a specific section for this purpose.

Whenever occasional issues are raised, the technical teams provides immediate clarification (e.g. questions about benefits or activities in progress). In cases where a critical question is raised, the same template provides for an action plan, where the issue is recorded to enable coordination with other relevant team members and ensure follow-up at subsequent meetings.

Forestry Operations

In forestry operations in Portugal and Galicia, there is regular contact with Stakeholders for listening to their points of view on the (social and environmental) impacts of our activities. This information is collected through consultations, informal conversations or the circumstances arising from occurrences: (i) in prior assessments for operational planning and project design, by completing the Support for Operational Planning and Project Design checklist, selecting stakeholders in keeping with the values at stake or

the context of the area where work is planned; (ii) before or during execution of forestry operations, when communication is effected using the Local Stakeholders Consultation Form; (iii) in meetings held for specific purposes, serving for recording the minutes of meetings or the reports produced; and (iv) whenever impacts from activities occur during forestry operations, and are logged as an occurrence. [S3.21 | S3.22]

The effectiveness of dialogue with affected Communities is assessed through the annual stakeholder consultation conducted by the forestry management certification authority for the areas managed by the Company. [S3.21d]

If the impacts identified through these regular contacts and the measures designed to mitigate them are not yet set our in the technical reference documents of the Forestry Management System, they are incorporated so they can be taken into consideration at a future date.

5.3.3.2.3. Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

Although negative impacts on Community economic, social and cultural rights have not been identified, the Company has adopted a **systemic approach to identifying and assessing environmental and social impacts** from forestry activities. This process gives rise to matrices used in a operational planning and execution phase, permitting not only prevention of negative impacts, but also action if such impacts occur. [S3.27b]

As part of this assessment and as stated in the previous section, we conduct local consultations with Stakeholders, including Local Communities and/or Specialists on the different natural, social and cultural issues involved. In order to achieve effective communication with affected Stakeholders, we provide several channels for contact (Chap. 5.4.1). We have Whistleblowing Regulations and a Whistleblowing Channel (Chap. 5.4.1), which can be accessed by any member of the affected Communities. This Channel allows for the reporting and analysis of potential Human Rights violations, including situations of breach of the Code of Ethics and Good Conduct and of the Human Rights Policy.

In addition, Stakeholders can also approach our Employees directly, by e-mail[43] and/or telephone[44]. In Mozambique, we also have the Community Liaison Officers, who act as an important bridge for direct communication with Communities. These channels provide a transparent and accessible means for Communities and other Stakeholders to be able to raise concerns and seek remediation, if necessary. [S3.27b]

5.3.3.2.4. Taking action on material impacts on affected Communities, and approaches to managing material risks and pursuing material opportunities related to affected Communities, as well as the effectiveness of those actions (S3-4).

We are committed to implementing a serious of measures to foster dialogue and boost the positive impacts on the Communities involved in our operations and thereby contributed to attaining the goals and targets established (see following section). [ESRS 2.68a | S3.32c]

[43] E-mail for Portugal and Spain: cadastro.florestal@thenavigatorcompany.com | E-mail for Mozambique: geral.mz@thenavigatorcompany.com

[44] Telephone number for Portugal and Spain: (+351) 265 709 000 | Telephone numbers for Mozambique (+258) 2148 3645/6/7

Main actions: [ESRS 2.68a]	*Status* [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.6 a ESRS 2.68e]
Community Monitoring Committees in Portugal				
Community Monitoring Committees	Executed and planned	Downstream of the value chain, in Aveiro, Figueira da Foz, Vila Velha de Ródão and Setúbal, featuring representatives of local actors (e.g. public institutions, local authorities, NGOs, schools)	Ongoing action	Meetings of the Community Monitoring Committees were successfully held, achieving: • Increased engagement by Community representatives; • Presentation of the findings of the questionnaires used in 2024, identifying the issues seen as most important by Local Communities; • Recognition by external Stakeholders of the relevance of the topics addressed and the rigour and transparency with which they were handled; • Introduction of new topics: Forest and Fire Management, Florestas.pt, Learning Center, social responsibility initiatives (e.g. Navigator Holiday Camp), Quinta de São Francisco and biodiversity programmes, technological innovation and bioeconomy projects, among others; • Consolidation of Navigator as credible and active interlocutor with Communities.
Activity Forestry in Portugal and Spain				
Communication with Stakeholders	Executed and planned	Own operations. Involves all Stakeholders in Portugal and Spain	Ongoing action	Regular contact with Stakeholders for listening to their points of view on the (social and environmental) impacts of our activities. The analysis has been conducted, incorporating positive and negative impacts, but reporting still needs to be improved.
Use of land	Executed and planned	Downstream of value chain. Involves third parties in Portugal and Spain	Ongoing action	• Prospecting and development of business opportunities in connection with multiple forest uses, through operations on agro-forestry holdings: Sale of 19 700 *arrobas* of cork (revenues: 331 594 €) • Sale of pasturage rights over 13 300 ha (revenues: 13 372 €); • Allocation of 15 890 ha to game management activities (revenues: 54 169 €); • Allocation of 2000 ha for parcelling purposes (revenues: 156 947 €); • Sale of eucalyptus branches in 400 ha (revenues: 32 880 €).
Communities Relations Management Procedure, Mozambique				
Village Meetings	Executed and planned	Own operations and entire value chain. Involves Communities and local organisations in Mozambique	Ongoing action	51 meetings were held in 2025 for listening and prior information for Communities.
"Door to door" visits	Executed and planned	Own operations and entire value chain. Involves local Communities in Mozambique	Ongoing action	Family visits, for listening to their needs and assessing level of satisfaction. A total of 3200 "door to door" visits were made by Community Liaison Officers in 2025.

Visits to work fronts	Executed and planned	Own operations and entire value chain. Involves local Communities and Service providers in Mozambique	Ongoing action	Liaison Officers made 262 visits to work fronts in 2025, with the aim of checking compliance with the hiring rules, good practices and Human Rights, on the basis of the established forms.
Social Development Programme in Mozambique				
Improved food security and diversity	Executed and planned	Own operations and entire value chain. Involves local Communities in Mozambique	Ongoing action	Included agricultural extension, through delivery of seeds, sweet potato cuttings and manioc seedlings, and monitoring of the production process, with a technical team which supported the families individually, as well as in demonstration fields for several families, which enabled them to learn about the best adapted crops and best practices. Vegetable gardens were implemented at 14 schools, with irrigated and non-irrigated land, with a view to improving the know-how of young people about best farming practices and in order to bring about improvements in food security and diversity, as well as means for increasing income. (See section on targets and metrics for information on results achieved).
Increased means for boosting income	Executed and planned	Own operations and entire value chain. Involves local Communities in Mozambique	Ongoing action	This has included bee-keeping, fish farming and goat herding. In all these initiatives, Portucel Moçambique supported the launch of the activity, with materials and technical assistance, whilst the beneficiaries also took on obligations, in line with their commitment to developing their activities autonomously. (See section on targets and metrics for information on results achieved).
Improved welfare	Executed and planned	Own operations and entire value chain. Involves local Communities in Mozambique	Ongoing action	Includes actions such as access to drinking water, renewable energy, rehabilitation of schools (investment of 15 thousand euros), support for construction of hospital infrastructures, and construction and rehabilitation of access roads and bridges. Work also included improvement/construction of water crossings (bridges and aqueducts), with a total value of 75 thousand euros. (See section on targets and metrics for information on results achieved).
Construction of Operating Theatre	Executed	Own operations and entire value chain. Involves local Communities in Mozambique	One-off	The Operating Theatre at the Ile district Health Centre, in Zambézia province, was officially opened in June 2025, directly serving a population of 250 thousand in the district, and another 180 thousand in neighbouring districts, according to official information. The investment, under the SDP, was approximately 250 thousand euros.
Support in acquisition of materials for construction of classrooms.	Executed and planned	Own operations and entire value chain. Involves local Communities in Mozambique	Ongoing action	Support for purchase of construction materials for 3 classrooms at the Mugulama Secondary School, district of Ile, Zambézia provinces, with a value of approximately 15 thousand euros. Investment to date ion supporting construction and rehabilitation of school facilities of approximately 80 thousand euros.
Literacy programmes for Communities				
Give the Forest a Hand	Executed and planned	Involves the younger community, in Portugal	Ongoing action	In 2025, the Give the Forest a Hand project was active in several locations in Portugal, with a range of initiatives: Ponte Sôr, Vieirinhos, Coimbra, Lisbon, Montijo, Costa da Caparica, Lavos, and elsewhere.
Forest of	Executed and	Own operations and	Ongoing	In 2025, The Forest of Wisdom impacted 12 872 people (mostly students and teachers) and organised more than 600 practical activities in forestry and

Wisdom	planned	entire value chain. It involves local/regional Communities, particularly the Aveiro school community, but it also involves activities with schools and universities from other Portuguese districts.	action	laboratory settings; Forest of Wisdom activities organised at PAEMA (Aveiro Municipality only) – 6569 students and teachers; Teacher training – approximately 30 teachers, over 3 sessions; Training of students in vocational colleges - 36 students and teachers.
Navigator Tour	Executed and planned	Own operations and entire value chain, in Portugal.	Ongoing action	A total of 133 visits took place in 2025, with 2734 visitors.

Note: Only positive impacts and no negative material impacts were identified relating to the Community's economic social and cultural rights [S3.32c], meaning that no remediation actions are identified. [ESRS 2.68d]

Current financial resources are applied in actions or action plans with a community impact, mostly in the form of personnel expenditure and Supplier payments, as well as under the Social Development Programme. [ESRS 2.69b]

In 2025, the meetings of the Community Monitoring Committees (CMCs) stepped up Navigator's dialogue with Communities and local bodies, providing an opportunity to share up-to-date information and to systematically gather contributions on environmental, social and economic topics. At the Aveiro Industrial Complex (AIC), the debate pointed to the diversity of nationalities (13), underlining the need to work towards linguistic, cultural and family integration of these Employees. As a result, the Cacia Civil Parish Council and the Rio Novo do Príncipe School Grouping reported on the programmes they have undertaken in order to integrate foreign citizens in the Community, and in particular to follow through 140 students of 23 nationalities, with support from cultural and language mediators- The new industrial ventures at this complex were also presented, in particular the decarbonisation projects and the new tissue unit.

At the Setúbal Industrial Complex (SIC), the meeting focussed above all on environmental issues and on the industrial projects in progress. There was discussions of the brownish colouring observed in the river, considered residual, as well as the planned capital expenditure in the Pulp Mill in order to mitigate this phenomenon. It was announced that air quality in the SIC area was to be monitored in partnership with IDAD (Institute of the Environment and Development of the University of Aveiro), based on two fixed points placed upstream and downstream of the prevailing wind in that region. On industrial matters, there was a presentation of the Recovery Boiler 4 project, which will enable the complex to eliminate the use of fuel oil and reduce odours.

At the Vila Velha de Ródão Industrial Complex (VVRIC), the session centred on environmental monitoring and the challenges relating to human capital. Attention was drawn to the VVRIC reporting system, which records every 15 minutes and reports weekly to APA (as at other Navigator units). There was also a presentation of the VVRIC workforce, comprising 255 employees of five nationalities, pointing out the difficulties in attracting and retaining talent in the region, especially for technical positions, due to the region's structural constraints, such as the limitations on accommodation and transport. In the field of training, attention was drawn to the partnership with IEFP on the Industrial Production Technical Course, which combines technical training at IEFP centres and practical training at Navigator's units. There are plans for involving the Municipal Council as sponsor to help trainees settle in the region. Internal social responsibility programmes were also discussed, including the Merit Bursaries awarded to the children of employees.

Around the country, the meetings of the Navigator CMCs considered internal social responsibility initiatives, such as the Merit Bursaries, the internship programmes and the Holiday Camp for Employees' children, which are designed to strengthen the connection between the Company and the local areas. The meetings also included presentations of initiatives, such as Florestas.pt, the biodiversity programmes at Quinta de São Francisco (RAIZ) and the training partnerships, in particular the Qualifica Programme, which has already enabled dozens of workers to conclude their secondary education. [S3.21d]

In 2025, we continued to foster close ties between the Company and its various stakeholders, through our My Planet, Give the Forest a Hand, Biodiversity and Florestas.pt projects.

In connection with the Florestas.pt project, The Navigator Company stepped up its commitment to sharing knowledge and promoting sustainability, inviting Portuguese specialists in different areas and regions to contribute content to the platform. This collaborative approach involved more than 50 authors, including university professors, technical staff from forestry departments, specialists, finalists at the Instituto Superior de Agronomia, producers and fire-fighters, among others. The aim was to enrich the content and promote "knowledge communities", integrating different perspectives on forests and forest management. This co-creation approach has boosted the platform's credibility and added to Navigator's reputation as an active force in advancing the forestry sector, with positive impacts for the sector and for society.

Navigator contributed to the Lisbon Book Fair with its project aimed at a younger audience, Give the Forest a Hand, highlighting its commitment to environmental education and to working to improve woodlands. During the weekends of this event, educational games were organised, aimed especially at younger visitors, enabling them to enjoy themselves while learning about the importance of forests and sustainability.

This involved interactive games, creative challenges and educational content designed to stimulate curiosity and teach children about the environment. This initiative helped bring children and families closer to the world of forestry through an immersive experience. With this event, Navigator was able to present its Give the Forest a Hand project as a benchmark in educational games and online learning, helping to shape a new generation which is more aware and more responsible. Efforts were also made to reach more children and parents and a wider school community through a partnership with "Stars & Hedgehogs", which culminated in participation in the project for the 6th Stars & Hedgehogs Conference, for reflecting on children's play in Portugal.

On the subject of **forestry activity in Portugal and Spain**, we **have regular contacts with Stakeholders** for listening to their points of view on impacts (social and environmental) and prospecting and developing business opportunities in using woodlands for multiple purposes, through agro-forestry initiatives. Only the implementation of this action – Use of Land – required significant operational expenditure (OpEx) (current and future), through the budget allocation for Land Use. [ESRS 2.68 | ESRS 2.69b]

The **Social Development Programme in Mozambique features three priority areas for intervention** – (i) improve food security and diversity, (ii) boost the means of increasing income, and (iii) improved welfare – on which continued during the reporting year.

A significant development in 2025 was the official opening of the Operating Theatre at the Ile District Health Centre, in Zambézia province, Mozambique, a facility supported by Portucel Moçambique with investment of close to 250 thousand euros. The Operating Theatre will directly benefit 250 thousand inhabitants of Ile district and, indirectly, a further 180 thousand inhabitants of the neighbouring district of Namarrói; it will give a very significant boost to maternity care, in view of the high birth rate in the country and the corresponding need for facilities to improve safety in childbirth.

The Company funded the construction of this Operating Theatre as part of its Social Development Programme, in line with its aim of contributing to the improved welfare of Communities in the project areas, in the fields of health and education, which has increasingly involved work with schools.

Portucel Moçambique's contribution to the construction of this health facility was the result of cooperation with the local authorities, in identifying needs and in regular monitoring, a practice adopted in most of the initiatives undertaken. providing technical support whenever necessary, with a view to successful execution of the projects.

In future, we aim to strengthen the role of the Community Monitoring Committees, so that they can function as a forum for two-way dialogue, there the Company can share its good practices and where Stakeholders have the chance to present projects on which they are working, whilst also presenting their particular perspective. In Mozambique, the Village Meetings, the "door to door" visits and visits to work front remain the main initiatives for implementation.

As for the type of financial and other resources, current and future, allocated to the action plan, it is stressed that Navigator has adopted additional measures and initiatives, with the prime aim of generating positive impacts for the affected Communities, such as promotion literacy in the field of forestry and biodiversity, monitoring these projects through metrics, in its 2030 roadmap. [S3.32c | S3.32d | S3.38]

In 2025, there were zero negative comments on forestry activities in our regular contacts with Stakeholders and two negative comments in the annual consultation of Stakeholders, conducted by the certification body. When negative comments are received in the annual consultation, the certification body checks with us to ascertain whether there are grounds for the comments or not, providing the respective response to the Stakeholder. We believe that this procedure has enabled Stakeholders to get to know us and our operations better, improving the opinion of the Company in the local Community. In the course of this work, a comprehensive consultation of Stakeholders is undertaken, including the local Community and Specialists in different areas with a possible impact on them.

In addition, we provide a number of communication channels, for Stakeholders to be able to express their opinions and raise concerns, such as The Navigator Company website and the Whistleblowing Channel.

In forestry operations in Portugal, Spain and Mozambique, Stakeholders may do this by contacting our Employees in person, by email or by telephone.

In Mozambique, there are also the Community Liaison Officers, who play an essential role in maintaining the flow of communication between the Community and the Company. There is also a relationship management procedure, where all requests (reports, complaints, queries and others) are handled systematically, seeking to ensure they are assessed and answered in due time. [S3.32d]

It should be stressed that there were no Human Rights incidents in 2025 related to the affected Communities. In addition, we can report that the Company does not operate in areas with indigenous peoples and did not record any legal disputes concerning rights over land, or their free, prior and informed consent.

5.3.3.3. Targets and metrics

5.3.3.3.1. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5, MDR-M)

Under our 2030 Roadmap (Chap. 3.4.4), we set out to hold, each year, eight meetings of the Community Monitoring Committees in the areas around the Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão industrial units. [ESRS 2.80] This target is in keeping with SDG 12 – Sustainable Production and Consumption, falling under target 12.8 – By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature. [S3.AR35]

Goal and target	*Baseline* [ESRS 2.80d]	Associated metric [ESRS 2.75]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
Hold, each year, eight meetings of the Community Monitoring Committees in the areas around the Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão industrial units.	CMC meetings in baseline year: 3 Baseline: 2022	No. of CMC meetings	8 CMC meetings	8 CMC meetings	7 CMC meetings	8 CMC meetings/year Target year: 2030
Run Forest Literacy initiatives for primary school children, adolescents and adults, in order to contribute to better knowledge of Portugal's forests, their environment, social and economic importance, through the Give the Forest a Hand, My Planet and Florestas.pt projects.	Baseline: 2020	No. initiatives/year No. children contacted/year No. teenagers contacted/year	5,236 children reached: 12 in-person initiatives 3 editions of magazine, with average print run of 15 thousand copies. 4824 teenagers and adults reached: 7 in-person initiatives 2 editions of My Planet, magazine with average print run of 16 thousand copies. 19 in-person initiatives: 5 editions of magazine 1012 online content items 11 competitions	more than 6 thousand children reached 4 editions of magazine with average print run of 15 thousand copies 540 online content items 12 competitions 1 edition of My Planet magazine, with print run of 17 500 copies Presence at Eucalyptus Forum handing out approximately 260 magazines Activation at the Faculty of Humanities of the University of Coimbra 126 online content items 7 awareness raising actions/participations in initiatives 4 new Partners Visit to 6 schools in various parts of the country Presence at 7 fairs/festivals	more than 6 thousand children reached 3 editions of magazine, with average print run of 21 thousand copies. 651 online content items 47 504 hits on website 12 competitions Visit to 6 schools in various parts of the country 8 activations in various locations 2 editions of My Planet magazine with print run of 20 000 copies 177 online content items (74 on social media + 103 articles) 36 700 hits on website Florestas.pt: Project engagement with teachers and students in primary and secondary education in training sessions and presentations Participation in scientific and business events and CMC 5 new partners Visit to 4 schools	10 initiatives/year (digital and in-person) 20 thousand children contacted/year 40 thousand teenagers contacted/year Target year: 2030

					(more than 215 students)	
"Floresta do Saber (Forest of Wisdom) – Education Dissemination of Forestry, Bioeconomy and Bioproducts	Base value: 0 Baseline: 2020	No. participants	10 510 participants (from 2020 to 2023: 17 652 participants); 753 activities in 191 in-person events 7 think tanks 2 exhibitions	13 318 participants (from 2020 to 2024: 31 187 participants)	12 872 participants (from 2020 to 2025: 43 842 participants) 2500 activities	70 000 participants (accumulated figure 2020- 2030) Target year: 2030

In relation to the Community Monitoring Committees, the target applies to the downstream value chain in Portugal [ESRS 2.80c], and is not directly related to the policies described above. [ESRS 2.80a] Defined on the basis of the following qualitative assumptions; the holding of a meeting in the 2nd quarter and another in the 4th quarter of each year, at Navigator's four industrial units in Portugal – Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão –, with the participation of the representatives of the main Stakeholders of these regions where the Company carries on its operations. Meetings are schedules depending on the availability of the CMC Chair, an independent figure, and of the Navigator members. For each meeting, notice is sent out with an agenda of environmental and social issues relevant to Navigator and the Communities. The format and frequency were agreed between the parties - Navigator, Chair of the Committee and the Stakeholders involved, and are determined on the basis of the minutes of the meetings held. [ESRS 2.80f/h e ESRS 2.77a/c] In 2025, the target of holding eight meetings was not achieved insofar as the second CIVVR CMC meeting only took place in January 2026. This was due to diary difficulties for some of those involved (this CMC has a small number of members, so if only a few are unavailable, the meeting ends up being relatively unproductive, with a small attendance).

In relation to the Forest of Wisdom and Give the Forest a Hand projects, the targets are measured on the basis of qualitative criteria related to brand activation, positioning and media presence. The analysis considered the consistency of messaging, the regularity of communication, the visibility achieved in the different channels and the contribution of the intiatives to building up brand identity and territory.

5.3.3.3.2. Entity-specific metrics (MDR-M)

In addition to the metrics associated with the targets described, other entity-specific metrics have been established, related to: (i) **investment in Community infrastructures and** in Portugal, including investment in euros in Communities; (ii) the **Social Development Programme in Mozambique;** and (iii) **Navigator Tour**. [ESRS 2.77c]

Metrics	2025	2024
Investment in Community infrastructures and services		
Donations in paper, in Portugal	19.6 t More than 33 000 €	41.9 t More than 50 000 €
Donations of nursery plants, in Portugal	608 plants	875 plants
Financial support, in Portugal	55,250 €	37,096 €
Investment, in euros, in Community initiatives	1.4 M€	1.6 M€

Metrics	2025	2024
Social Development Programme in Mozambique[45]		
Families reached	6 700	7 000
Improved seeds distributed	1 260 t	1 153 t
Improved barns	2 465	2 465
Sweet potato cuttings (orange flesh)	116 000 kg	111 928 kg
Manioc seedlings and cuttings	1 113 928 manioc seedlings (96 738) and cuttings (1 017 244)	1 113 928 manioc seedlings (96 738) and cuttings (1 017 244)
Kids distributed	3,081	2,922
Fish tanks	65	65
Hives distributed	1,947	1,757
Honey produced	8 532 kg	6 326 kg
Boreholes built	46	38
Boreholes repaired	68	64
Solar lamps distributed	4,203	4,203
Vaccines administered to poultry against Newcastle disease	949 201	949 201
Persons involved in environmental awareness raising	19 144 (45% women)	15 175 (45% women)
Investment, in US dollars, in initiatives under the Social Development Programme in Mozambique	8.9 M	8.2 M
Navigator Tour		
School visits (including higher education)	56 visits, with 1911 participants	48 visits, with 1 539 participants
Institutional visits	68 visits, with 1381 participants	56 visits, with 760 participants
Employee visits	9 visits, with 432 participants	7 visits, with 556 participants

Navigator Tour is the programme of institutional visits, designed to promote closer relationship, transparency and knowledge sharing with different Stakeholder groups. This programme involves welcoming secondary school and higher education groups, as well as national and international institutions in different areas, enabling people to learn about industrial activities, responsible forest management and the Company's sustainability strategy.

The visits are made to Navigator's four industrial units (Aveiro, Figueira da Foz, Setúbal and Vila Velha de Ródão), at Viveiros Aliança and Instituto RAIZ, enabling participants to see for themselves our production processes, technological innovation and good environmental and social practices adopted along the value chain.

In Portugal, Navigator has also supported a number of well-known initiatives and bodies, such as the American Chamber of Commerce in Portugal and the Fundação Nossa Senhora do Bom Sucesso. We can point in particular to support for the event COTEC Europa 2025, the 2025 Book Fair, ECCE/ECAB Lisbon 2025 and for the University of Coimbra Press (Joaquim de Carvalho Prize).

[45] At 31/12/2025, accumulated since the start of the Social Development Programme in Mozambique, except for the indicator *Families Reached*, which are envisaged by the project.

Cultural and social inclusion issues were again important factors in targeting these donations, with contributions to cultural associations and residents' committees in our communities.

Plants from our Aliança Nurseries are another important way in which we support Communities. In 2025, **608 species were donated** to five institutions: Figueira da Foz District Hospital, Mem Ramires Primary School - Dr. Ginestal Machado Schools Group, Primary School 2, 3 in Vale de Milhaços, Associação REMAR and the Portuguese Association of Physics and Chemistry Teachers.

5.4. Governance disclosures

5.4.1. ESRS G1: Responsible business conduct

5.4.1.1. Strategy

5.4.1.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Description [ESRS 2.48a]	**Impact, Risk or Opportunity** [ESRS 2.48a]	**Time horizon** [ESRS 2.48ciii]	**Location in value chain** [ESRS 2.48a]	**Sub-topic or related sub-topic** [ESRS 2.48h]
Development of a responsible business culture adds to the Employees' sense of belonging, boosting their motivation and Navigator's ability to retain staff.	Positive impact	--	Own operations	Corporate culture
Responsible Supplier management, establishing partnerships with shared values of social and environmental responsibility, can contribute positively to the Community and to the environment.	Positive impact	--	Own operations	Management of supplier relations, including payment practices
Robust anti-corruption practice contribute to an fairer and more transparent business environment.	Positive impact	--	Own operations	Corruption and bribery
Disclosure of incorrect information may have consequences for Navigator's reputation and may even cause it to incur fines.	Risk	Short term – reporting year	Own operations	Corporate culture
	Risk	Short term – reporting year	Own operations	Corporate culture

NB: the material impacts identified are actual, and so there is no associated time horizon.

5.4.1.2. Management of impacts, risks and opportunities

5.4.1.2.1. Business conduct and business culture policies (G1-1, MDR-P)

Promotion of corporate culture

We are committed to ensuring **Responsible Business Conduct**, founded on the underlying principles of **Trust, Integrity, Enterprise, Innovation, Sustainability and Excellence**, reflected in a comprehensive set of Group Codes and Policies - including **Codes of Ethics and Good Conduct, Human Rights Policy, Compliance Policies**, among other documents and initiatives, such as the GROWING project, which recently resulted in the **Employee's Guide** or the **"Leading with purpose" Handbook** (Chap. 5.3.1).

In order to implement these principles effectively, we have a robust and efficient **compliance system**, ensuring clarity in responsibilities and promoting effective communication between the different parties involved. In 2025, the Compliance System Governance model was revised and updated, in order to strengthen the strategic positioning of the Ethics & Compliance function. This system is aligned with international best practices, with a structure and organisation based on the coordinated action of internal functional units, in combination with management and audit boards, with a view to supporting the decision-making process, and ensuring transparency and integrity throughout the value chain. [G1.9] To this end, we have established the Ethics & Compliance department, responsible for implementing the Compliance Policies which underpin the Navigator Group's activities throughout the legal and regulatory value chain, in keeping with high standards of transparency and fairness and designed to prevent and combat wrongdoing. The main mission of the Ethics & Compliance department is to ensure compliance with the applicable legal requirements, preventing corruption, money laundering and terrorist financing, promoting compliance with international sanctions, avoiding conflicts of interests and promoting protection of Human Rights and personal data. [G1.9]

Attention is drawn to the **Ethics and Integrity Committee**, which plays a fundamental role in promoting and overseeing the ethical principles that guide our actions. Its rules of procedure define the respective powers, functioning and responsibilities, ensuring that ethics and good conduct rules are effectively applied. Through analysis and monitoring of ethical issues, this committee adds to Navigator's commitment to integrity, transparency and responsibility. [G1.9]

With a view to promoting a compliance culture, based on ethics and integrity, we invest in training our Employees. For this purpose we offer **ongoing training** in compliance issues, in particular concerning the Code of Ethics and Good Conduct, Internal Policies, Whistleblowing, Prevention of Corruption and Related Offences (see section G1-3). Available in an e-learning format, these training courses are aimed at all Employees, and make use of practical examples in everyday situations to promote interactive learning about the Company's internal instruments. The aim is to familiarise Employees with these policies, underline their importance and help them to understand the principles they establish. In 2025, the Ethics & Compliance department complemented the existing training, by providing a new training module on personal data protection. [G1.9 | G1.10g] We also invest in **developing our organisational culture**, encouraging employee engagement through innovative programmes. The **GROWING** project (Chap. 5.3.1), for example, sets out to strengthen our corporate identity and to promote a collaborative, participative and inclusive working environment. [G1.9]

With a focus on engagement, alignment and development of younger people, we have programmes such as the Future Leaders Forum, and the Future Leaders Board, encouraging active participation by emerging talents in the business strategy on topics posing real and significant challenges to the Company- In addition, the Straight To The Top programme encourages innovation and continuous improvement through the sharing of ideas, and is open to all employees (Chap. 5.3.1). [G1.9]

Internal communication, essential for developing corporate identity (by aligning values, strengthening organisational culture and promoting Employee engagement in Navigator's strategic vision) is also a priority area. Key initiatives here include the period Managers' Forum and the Supervisors' Forum, which serve to align top management and the operational teams.

Employee recognition and awards are important for developing a solid corporate culture, promoting motivation, engagement and positive and productive working environment. We therefore work to build a sense of belonging and engagement with the corporate culture by celebrating special dates, such as in the Length of Service Awards, distinguishing those who have contributed to Navigator's story over the years, and by investing initiatives to foster togetherness, such as the Family Open Doors programme and the Holiday Camp initiative for Employees' children. [G1.9]

Policies and documents shaping the corporate culture

Among the documents shaping our corporate culture, we can point to the **Code of Ethics and Good Conduct**, which establishes the model of ethical and professional conduct to be followed by all Employees, both in pursuing Navigator's business activities and in dealings with third parties, as well as the fundamental principles promoting an organisational culture based on excellence, transparency, respect and sustainable development. The matters regulated in the Code of Ethics and Good Conduct are subsequently set out in policies, specific codes of conduct, internal procedures and guidelines. [G1.7 | ESRS 2.65]

By means of our **Human Rights Policy**, we acknowledge the importance of respect for Human Rights and employment rights as an integral part of how we carry on our business, in keeping with the principles laid down in key intergovernmental documents (see following table).

In addition, **Navigator Tissue UK** complies with the requirements of the **Modern Slavery Act 2015**, recognising and complying with its legal obligations and committing itself to continuously improving practices to eradicate any form of modern slavery or human trafficking. This commitment takes the form of a public declaration - the Anti-Slavery and Human Trafficking Statement - in which it clearly describes how it implements policies and procedures designed to **identify, prevent and mitigate potential risks**, both in our own operations and in the suppliers chain. [ESRS 2.65d]

Document	Code of Ethics and Good Conduct
Key content and goals [ESRS 2.65a]	The Code of Ethics and Good Conduct reflects Navigator's values, namely: Trust, Integrity, Enterprise, Innovation, Sustainability and Excellence. In addition, it addresses central topics such as: Prevention of corruption and money laundering; Conflicts of interests; Shareholder relations; Competition; Intellectual and industrial property; Social responsibility and sustainable development; Safety and working conditions; Professional development and advancement; Discrimination and personal data protection, among others.
Scope [ESRS 2.65b]	Applies to own operations. Has an impact on all Group Stakeholders, in particular on Employees and Communities. Applies to all geographical regions where Navigator operates.
Most senior level responsible for implementation [ESRS 2.65c]	Board of Directors
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	In alignment with the Universal Declaration of Human Rights and ILO Conventions
Availability [ESRS 2.65f]	Communication to all Employees, Business partners and Stakeholders through the intranet and online. Employees are also given training in this matter.
References over the course of the non-financial statement	• S1 – Own workforce (Chap. 5.3.1) • S3 – Communities affected (Chap. 5.3.3)

Document	Human Rights Policy
Key content and goals [ESRS 2.65a]	Asserts Navigator's commitment to Human and Employment Rights, integrating them into its activities, in keeping with key international standards.
Scope [ESRS 2.65b]	Applies to own operations. and to value chain, upstream and downstream. Has an impact on all Group Stakeholders, in particular on Employees and Communities. Applies to all geographical regions where Navigator operates.
Most senior level responsible for implementation [ESRS 2.65c]	Board of Directors
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d/ S1.20]	• International Bill of Human Rights • OECD Guidelines for Multinational Enterprises • Fundamental Conventions of the International Labour Organisation • United Nations Guiding Principles on Business and Human Rights
Availability [ESRS 2.65f]	This document is communicated to all Employees, Business partners and Stakeholders through the intranet and online. Employees are also given training in this matter.
Most relevant complementary documentation	• Portucel Moçambique's Internal Regulations and Good Practice Guides for Temporary Workers and Service Providers • Modern Slavery and Human Trafficking Statement – Navigator Tissue UK
References over the course of the non-financial statement	• S1 – Own workforce (Chap. 5.3.1) • S2 – Workers in the value chain (Chap. 5.3.2) • S3 – Communities affected (Chap. 5.3.3)

In order to prevent and mitigate the risks involved in the relations we establish with third parties, we are able to rely on a series of **internal Compliance instruments, most notably the Code of Conduct for Suppliers**. So as to ensure compliance with this commitment, we have implemented compliance clauses which establish obligations for Navigator's counterparties on matters of money laundering, prevention of corruption, Human Rights and international sanctions, as well as a Third Party Vetting System, enabling us to assess counterparty risk from the same perspective.

We are also committed to ensuring impartiality and transparency in decision-making processing, preventing potential conflicts of interests that may undermine the integrity of our operations. We can here point to the **Regulations on Conflicts of Interests and Related Party Transactions**, which lays down clear guidelines for identifying, reporting and mitigating these situations, promoting an environment of trust and impartiality. [ESRS 2.65d]

With regard to the **Policy for Prevention of Corruption and Related Offences** (see complementary information in sections G1-3 and G1-4), this is aligned and complies with the applicable legal requirements, in particular the General Rules on the Prevention of Corruption. [ESRS 2.65d] In accordance with our **Plan for Prevention of Corruption Risks and Related Offences**, the functions most exposed to the risk of corruption and bribery are primarily the sectors for contracting goods and services, sales, institutional relations and marketing. [G1.10h]

Document	Compliance Policies - Counter Terrorist Financing Policy; Third Party Vetting Policy and Anti-Money Laundering and Terrorist Financing Policy
Key content and goals [ESRS 2.65a]	The documents reflect the general principles adopted by the Navigator Group in its dealings with third parties and the conducts which are expressly prohibited in the context of the relations it establishes in the course of its business; they also establish the measures for preventing these risks, through implementation of appropriate due diligence procedures, in order to assess the risk of criminal activities and the integrity of Navigator's counterparties.
Scope [ESRS 2.65]	Covers all Navigator’s geographical regions.
Most senior level responsible for implementation [ESRS 2.65c]	Board of Directors
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• International sanctions established by EU or UN • Recommendations of Financial Action Task Force (FATF)
Availability [ESRS 2.65f]	Communicated to all Employees, Business partners and Stakeholders through the intranet and online. Employees are also given training in this matter

Document	Policy for Prevention of Corruption and Related Offences
Key content and goals [ESRS 2.65]	The underlying principles are Navigator's complete commitment to preventing corruption, the broad, cross-Group prohibition of corrupt practices and related offences and recognition and consolidation of the culture of ethics and integrity already instituted, both in its direct dealings with third parties, and in its Employees' dealings with third parties, in the course of their duties.
Scope [ESRS 2.65]	Covers all Navigator's geographical regions.
Most senior level responsible for implementation [ESRS 2.65c]	Board of Directors
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• International sanctions established by EU or UN • Recommendations of Financial Action Task Force (FATF)
Availability [ESRS 2.65f]	Communicated to all Employees, Business partners and Stakeholders through the intranet and online. Employees are also given training in this matter.

Document	Code of Conduct for Suppliers
Key content and goals [ESRS 2.65a]	Furnished to all materially relevant Suppliers and in all market consultation procedures [G1.20], its sets out the ethical standards expected in the supply chain. Addresses topics such as prevention of corruption and bribery, respect for Human Rights, employment practices, health and safety and environmental practices.
Scope [ESRS 2.65]	Applies to upstream operations in the value chain. Has an impact on all Group Stakeholders, in particular on Employees and Communities. Applies to all geographical regions where Navigator operates.
Most senior level responsible for implementation [ESRS 2.65c]	Board of Directors
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• Universal Declaration of Human Rights and ILO Conventions • OHSAS 18001 • ISO 14001
Availability [ESRS 2.65f]	Furnished to all materially relevant Suppliers and in all market consultation procedures. Available on Intranet pages and online. Employees are also given training in this matter.
References over the course of the non-financial statement	• S2 – Workers in the value chain (Chap. 5.3.2)

Document	Code of Conduct for Suppliers (Mozambique)
Key content and goals [ESRS 2.65a]	Sets out the responsibilities of Suppliers and Service providers, with the aim of long term pursuit of sustainable business, based on sound ethical foundations and responsibility, taking into consideration matters such as the global economy and human, social and environmental factors.
Scope [ESRS 2.65b]	The code applies to all suppliers of Portucel Moçambique, including suppliers of products, service providers and all their respective subcontractors. Applies to Navigator's geographical region of Mozambique.
Most senior level responsible for implementation [ESRS 2.65c]	Directors of Portucel Moçambique and Executive Management.
Standards or third party initiatives which the Company undertakes to comply with [ESRS 2.65d]	• Performance Standard of IFC (International Finance Corporation)
Availability [ESRS 2.65f]	Furnished to all materially relevant Suppliers. Available online. Provides for clarification of queries, ethical or compliance issues, using a specific email address: fornecedores@portucelsoporcel.co.mz
References over the course of the non-financial statement	• S2 – Workers in the value chain (Chap. 5.3.2)

Cybersecurity

Management of information security and compliance is a **strategic pillar** for The Navigator Company, underpinning the **digital transformation** of the organisation and ensuring **continuous protection of its information assets**, as well as the **resilience of operations**.

The Company faces significant challenges, in particular:

- the need to strengthen and automate security controls;
- increased organisational **maturity** in the fields of technology, processes and human skills;
- compliance with standards and directives, in particular NIS2;
- promotion of a security **culture** across all sectors;
- clarification and consolidation of responsibilities in **information security management**.

In order to respond to these challenges, we have an **integrated strategy** aligned with international benchmarks, including the NIST Cybersecurity Framework, the CIS Controls, ISO/IEC 27001 and the General Data Protection Regulation (GDPR). This approach is based on designing corporate **policies** and **procedures**, on **adopting automated control tools**, and on continuous improvement of team **awareness** and additional **training**.

Operational resilience, risk reduction and **regulatory compliance** are the central principles of this cybersecurity strategy.

Whistleblowing channel and protection of reporters

We have implemented a Whistleblowing Channel which is available and accessible to all Employees, Suppliers, Clients, Service Providers or any other interested parties, as established in our Whistleblowing Regulations, permitting safe and anonymous

reporting of irregularities. The channel covers a wide range of infractions, including corruption and related offences, discrimination, harassment, health and safety, Human and Employment Rights and environmental protection. [G1.10a | G1.10e] This channel is provided on an online portal, managed by an external entity, contracted by Navigator, and permits reports of irregularities to be submitted through a fast and effective system able to detect, investigate and resolve issues - in line with the good conduct rules established internally and with the guaranteed principles of anonymity, confidentiality, safeguarding and non-retaliation in relations with reports, complying with data protection and information security standards and with the legal requirements under the Portuguese legislation transposing Directive (EU) 2019/1937. [G1.10a | G1.10e]

Reports are handled by a multidisciplinary team – the **Whistleblowing Board (WB)** –, comprising the Directors of Legal and Public Affairs (DLA), the Risk Management Director (DGR) and the Head of Ethics & Compliance. Whenever a report involves a member of the WB, it is forwarded to the Audit Board, ensuring impartiality and independence in the handling of each case. In addition, all reports of irregularities received are reported to the Audit Board and, whenever they involve a member of the Board of Directors or the Audit Board itself, the Ethics Committee is also notified. [G1.10a | G1.10e | G1.18a | G1.19]

The persons responsible for handing a report must determine whether the report contains the minimum grounds needed to trigger an investigation procedure, and also determine whether to involve other bodies, departments or Employees, when certain requirements are met. If the report presents the minimum level of grounds, the investigation procedure is launched, which consists of checking all the facts necessary to assessing the alleged irregularity. The investigation process may result in the report being dismissed or in corrective measures being proposed, forwarded to the Executive Committee and Audit Board, or to the Board of Directors, when the measures exceed the powers of the Executive Committee. In order to build trust in this procedure, we provide **specific training** in the reporting of irregularities, ensuring that all Employees understand how it works and the protection assured to reporters. [G1.9 | G1.10a | G1.10e | G1.10g]

The Whistleblowing Regulations confer extra protection on the reporter against any form of retaliation, as established in law, laying down that the report of an irregularity may not result in any way in any prejudicial treatment, act of retaliation, harassment, intimidation or discrimination against the Reported by Navigator or any other employees, and that Navigator must strive to ensure that this does not happen.

The Regulations accordingly provide that, in the event of proven retaliation, disciplinary proceedings will be opened or penalties applied against the person/entity retaliating, depending on whether it is an internal employee or a supplier/service provider.

At the same time, the Whistleblowing Channel guarantees confidentiality and secrecy, in particular with regard to the reporter’s identity, the facts reported and any third parties mentioned, in order to prevent risks of exposure, reprisal or duress.

5.4.1.2.2. Managing relations with Suppliers (G1-2, MDR- P)

Management of Supplier relations is a fundamental strategic area for the Navigator Group, in view of the significant impact of its purchasing policies on the creation and distribution of value**.** With thousands of companies and Workers in our supply chain, we are committed to establishing partnership relations and encouraging positive change, promoting a more sustainable, resilient and efficient supply chain. [G1.15a | G1.15b]

Our operations involve securing supplies of wood, biomass, chemicals and other products essential for the industrial process, as well as purchasing the power needed for production and consumption. These processes have environmental and social impacts, from the extraction and production or resources through to transport and use. In 2025 we dispatched products to 117 countries and approximately 3500 delivery points, using maritime, rail and road transport, with a commitment at all times to minimise the environmental footprint and to optimise the efficiency of the supply chain. In total, we work with **7829 Suppliers**, the most significant of whom are those of wood and biomass, chemicals and packaging, logistics and transport, energy and specialist services. [G1.15a | G1.15b]

Commitments made

Our operations reflect **environmental, social and economic concerns**, and are **supported by mechanisms and processes that ensure financial support and benefits**; the safety component is fundamental and complementary throughout our operations. The resilience of the supply chain and its response capability are key factors for ensuring business continuity. Sustainable Supplier management has become a priority issue in recent materiality analyses, leading us to establish commitments and goals in our 2030 Roadmap. Among the main targets set, we may points to the continuous increase in certified wood with the implementation of external information systems for ensuring the traceability of certified wood (e.g. woodchain), promotion of chain of custody certification, increased Supplier assessment on the basis of ESG criteria, incentives for adoption of sustainable practices and investment in the health and safety and training of Suppliers and Service Providers who operate in Navigator's forest holdings, in Portugal (Chap. 3.4.4). [G1.15a | G1.15b]

The **reduction in CO_2 emissions associated with the value chain** is another priority, aligned with the targets approved by the Science Based Targets initiative (SBTi), in 2022. We have embraced a commitment to reduce scope 3 carbon emissions, in particular those associated with our network of Suppliers and Logistical partners (Chap. 3.4.4). [G1.15a | G1.15b]

With regard to the national economic impact of the approximately 1900 million euros in the spending on supplies and services, around 71% corresponds to Portuguese suppliers, pointing to the structural role we play in shaping the Portuguese economy. This high level of incorporation of Portuguese supplies helps to energise the industrial fabric, to strengthen local value chains and to create and maintain employment.

In order to support our Suppliers, in particular wood Suppliers in the Iberian market, we have consolidated a series of measures, including **financial support for purchase of machinery, cash flow facilities and payment solutions using confirming.** The **Navigator Forestry Producers Club** is a ground-breaking initiative which sets out to add value to the countryside and to actors in the forestry sector, promoting co-investment programmes geared to promoting woodlands, sharing specialist technical expertise on forestry practices, leveraging RAIZ as a top R&D centre, reducing production costs for all involved and helping to train human resources. [G1.15a | G1.15b]

We also promote active engagement with Suppliers through **collaborative initiatives and knowledge sharing**. **Suppliers' Day**, held every two years since 2015, including in 2025, offers an opportunity for dialogue and continuous improvement, addressing topics such as cost reduction, industrial efficiency, sustainability, decarbonisation and innovation, challenging Partners with new ideas of how to do things differently and better, ensuring quality at a lower cost. [G1.15a | G1.15b]

Navigator's Materials Management Department works with Suppliers on projects with environmental and/or economic impact. These projects were mostly mentioned and detailed in item E1 on climate change (Chap. 5.2.2). Close cooperation with Suppliers,

combined with its presence in multiple geographical regions, is used by Navigator to promote business development across sectors and regions. This means that Portuguese Suppliers start to supply mills in Spain and Spanish Suppliers start to supply products in Portugal, in addition to other examples.

In 2025, Portucel Moçambique stepped up its commitment to safety throughout the value chain, promoting the adoption of preventive practices. This involved intensifying oversight in the field, with a focus on training, implementation of corrective measures and standardisation of safety procedures, encompassing Service providers and operational teams. The main initiatives undertaken in this field are detailed in item S2 on Value chain workers (Chap. 5.3.2). [G1.15a | G1.15b]

With regard to **logistical efficiency and reduction of the carbon footprint**, we have invested in optimising transport flows and complementarity between different modes of transport. In 2025, we pressed ahead with consolidating maritime services at local ports and developed deliveries in central and northern France by sea, significantly reducing the CO_2 emissions associated with road transport, resulting in an emissions reduction of approximately 669 tCO_2. In addition, we maintained out loyalty programme for hauliers and the incentive for fleet renewal, promoting the adoption of more efficient and sustainable vehicles. [G1.15a | G1.15b]

Energy contracting is another strategic area, aligned with our decarbonisation commitments. In 2025, approximately 67% of the electricity purchased was from renewable sources, and we can point to the 100% renewable 115 GWh Power Purchase Agreement with Endesa, the supply of power through physical PPAs with the solar facilities in Figueira da Foz and Ejea and the supply of 100% renewable electricity to Navigator Tissue UK. [G1.15a | G1.15b]

These initiatives have served to reassert our commitment to responsible management of our relationship with suppliers, promoting long term partnerships based on transparency, sustainability and innovation. [G1.15a | G1.15b]

Supplier selection and management

With regard to **Supplier selection and management**, we follow ethical, social and environmental criteria, ensuring that our supply chain operates in keeping with standards of integrity, ethics and sustainability. Crucial documents such as the **Code of Conduct for Suppliers**, which Suppliers are required to ratify, the Compliance Policy and the Human Rights Policy (see section G1-1) lay down due diligences procedures, promoting transparency and risk mitigation. We have implemented a **Third Party Vetting System**, enabling us to assess Suppliers on ESG criteria and to ensure with compliance with standards on matters such as prevention of corruption, money laundering and terrorist financing and protection of Human Rights. In addition, compliance clauses are included in Supplier contracts, ensuring compliance with internal standards, as well as adopting of the principles and rules they enshrine. These clauses include issues such as health and safety, respect for and promotion of Human Rights, and non-discrimination, as well as freedom of association and collective bargaining. [G1. 9 | G1.15a | G1.15b]

These practices reflect our commitment to responsible governance, based on transparency, prevention of unlawful practices, respect for Human Rights and promotion of a culture of ethics and sustainability throughout the value chain,

In **forestry activities**, we apply strict quality controls to operations, and in the course of projects we assess compliance by Service providers with technical benchmarks and with legal and environmental requirements. In Mozambique, these assessments are essential, due to the significant involvement of Workers and local Communities, ensuring that the practices adopted comply with the highest standards of social and environmental responsibility. [G1.15a | G1.15b]

We have been developing tools and methodologies to monitor the work of our Suppliers, promoting qualification and continuous improvement. The award of the **European Union Ecolabel to our products** is evidence of this approach, as it requires implementation of a strict process of supplier qualification and assessment, on the basis of environmental and performance criteria. Our sourcing and contracting procedure, created 2023, includes ESG criteria in Supplier assessments, adding to our commitment to sustainability. [G1.15a | G1.15b]

Our due diligence methodologies for wood purchases guarantee compliance with legislation and international standards such as those of the Forest Stewardship Council (FSC) and of the Programme for the Endorsement of Forest Certification (PEFC). We ensure that the wood acquired is not associated with unlawful or environmentally harmful practices, conducting audits and risk assessments throughout our supply chain. [G1.15a | G1.15b]

The Suppliers assessment model includes quality and service dimensions, as well as financial risk and ESG performance. This model, which is continuously being improved, is based on the consideration of these three dimensions and incorporates the Moody's ESG rating in the sustainability component. The assessment is conducted annually, and is reported to Suppliers in keeping with the principles of collaboration and continuous improvement. In order to complement Moody's ESG assessment, we developed our own questionnaire in 2025, which was sent out to materially relevant suppliers of chemicals and packaging, in order to monitor more closely their sustainability commitments, performance and practices. This questionnaire represents a further step forward in the process of Supplier assessment, allowing for more detailed analysis and stepping up our joint work with Partners towards implementation of best practices. [G1.15a | G1.15b]

5.4.1.2.3. Prevention and detection of corruption and bribery (G1-3, MDR-P)

Considering the international context in which we operate and the growing participation of the private sector in fighting corruption and related offences, as well as the legal obligations by which we are bound, we have adopted the **Policy for Prevention of Corruption and Related Offences** (see section G1-1). In addition to the principles already explained in its Code of Ethics and Good Conduct, this is underpinned by Navigator's wholehearted commitment to preventing corruption, by an absolute prohibition, across the Group, of any corrupt acts or related offences, and by implementation of a culture of ethics and integrity, both in the way we do our jobs and in our dealings with third parties with whom Navigator establishes any business dealings, or other third parties with whom Navigator Employees deal in the course of their work. [G1.18a]

In addition, we have established a **Plan for Prevention of Corruption and Related Offences Risk**, in which we identify the corruption risks and related offences to which the Company is exposed and define the assessment criteria for these risks, taking into account the probability of occurrence and potential impact, using a qualitative assessment scale for these two variables. In line with the severity of the risk, a risk matrix is drawn up, classifying risks on a scale of negligible, low, moderate, high and critical. [G1.18a]

We also have effective arrangements for preventing, detecting and responding to allegations of bribery and other offences, through the **Whistleblowing Channel** (see section G1-1). [G1.18a | G1.19] In order to ensure that the whistleblowing system is effective, responsibility for monitoring the Whistleblowing Channel is shared by several Navigator bodies, including the Audit Board, which periodically assesses the internal control systems and suggests improvements when necessary. [G1.18c]

Procedures and instruments communicated to all Employees, Business partners and Stakeholders through the intranet and online. [G1.20] In addition to being published on the websites, these commitments are published in management reports and in specific contractual clauses. [G1.20] Internal training is also provided to all Employees on compliance issues, in particular in relation to prevention of corruption and related offences (see section G1-1). [G1.21c]

The **training in Prevention of Corruption and Related Offences** is provided to Employees in an e-learning format, based on practical examples and everyday scenarios, in order to ensure that Employees understand and correctly apply Navigator's ethical principles and internal standards. The training is provided to board members, senior management and oversight officers, as well as to other Employees. Navigator offers ongoing training on the Code of Ethics and Good Conduct, Reporting of Irregularities, Internal Policies, Prevention of Corruption and Related Offences, which in 2025 reached 1894 Employees. [G1.10g] The topics addressed include acceptance and offering of goods and advantages, travel, meals, hospitality and entertainment, sponsorship and political donations, social and corporate responsibility, money laundering, international sanctions and KYC - Know Your Counterparty. The course also underlined the question of conflicts of interests, following on from the implementation of measures to step up internal control in this area. [G1.9 | G1.10g | G1.21c]

In 2025, these training modules were offered again to Employees who had completed them at least two years previously, enabling them to update and consolidate their knowledge.

	Functions subject to risk	Managers	AMSB (Administrativeand Supervisory Bodies)	Other Workers
Number of Employees	3284	360	16	2908
Number of Employees who received training	1534	192	0	1342
Percentage of Employees who received training	47%	53%	0	46%

Note: The term "functions subject to risk" was deemed to apply to Employees in the following sectors: Materials Management Department; Wood Supply Department; Logistics Department; Forest Management Department; Industrial Departments (including Tissue); Digital Technology Department; Financial Department; Marketing Department; Communications and Brand Department; Environment and Circularity Department; Energy and Energy Transition Department; Investor Relations Office; Portucel Moçambique; Public Affairs Department; Projects Department; European Paper Sales Department; International Paper Sales Department; Pulp Sales Department; Tissue Commercial Department; gKraft Commercial Division and E-Commerce. The category of "managers" includes all Employees with leadership duties, including Supervisory, and the ASMB category includes the Board of Directors and the Audit Committee.

It should be noted that Compliance training was provided in previous years, in an e-learning format. This means that the figures for training completed in 2025 does not reflect the total number of persons with the training, as a significant proportion of Employee had already completed the training in previous years.

5.4.1.2.4. Actions and resources in relation to material sustainability matters (MDR-A)

In connection with the Responsible Business Conduct topic, we identified the following material impact: "Robust anti-corruption practices contribute to a fairer and more transparent business environment". In order to address this concern, the Group has developed and adopted several measures designed to achieve a high standard of integrity, to improve transparency in commercial dealings and to mitigate corruption risks, ensuring compliance with regulatory requirements and Navigator's ethical principles. [ESRS 2.68 | ESRS 2.69]

The **actions adopted and planned accordingly** fall under Navigator's **Plan for Prevention of Corruption and Related Offences Risks (PPR)**, in which it identifies the risks of corruption and related offences to which it is exposed, establishes criteria for assessing these risks and lays down preventive and corrective measures designed to mitigate the likelihood of their materialising. In this context, the initiatives implemented represent the application of these measures, resulting in arrangements which add to the integrity and transparency of our business activities, ensure compliance with the applicable ethical and regulatory principles and contribute to a more responsible business environment. [ESRS 2.68a]

In connection with the **measures undertaken**, the resources mobilised essentially included internal resources, in particular the Ethics & Compliance team, with support from other departments.

Sustainable finance instruments, such as green bonds, social bonds or green loans, were not used, and execution of the plan was not tied to specific pre-conditions. [ESRS 2.69a]

Main actions:	Status	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	[ESRS 2.68 to ESRS 2.68e]
Design of procedures under the Plan for Prevention of	Planned	All locations, in all geographical regions	2026	Achieve the goal of a fairer and more transparent business environment

Main actions: [ESRS 2.68a]	Status [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.68 to ESRS 2.68e]
Corruption and Related Offences		The affected Stakeholders are Employees, Suppliers, Clients. but also other Stakeholders		
Vetting of counterparties	Executed and planned	Upstream and downstream locations, in all geographical regions The affected Stakeholders are Suppliers and Clients	Ongoing action	Risk reduction through counterparty monitoring
Assessment reports under Plan for Prevention of Corruption and Related Offences Risk	Executed and planned	Own operations, in all geographical regions The affected Stakeholders are Employees, Suppliers, Clients. but also other Stakeholders	Twice a year: Annual Report, in April, and Interim Report (optional), in October	Quantify the degree of execution of preventive and corrective measures defined and forecast of full implementation
Training in Prevention of Corruption and Related Offences	Executed and planned	Own operations, in all geographical regions. The affected Stakeholders are Employees	Ongoing action	Ensure Employees are familiarised with internal policies and further internalise Navigator values.
Regulatory mapping and gaps analysis in new geographical regions for operations	Executed and planned	Operations in recently integrated geographical regions, following on from acquisitions. The affected Stakeholders are local teams corporate support sectors and local regulatory authorities	Start in 2025, with conclusion in phases up to 2026	Identify normative framework applicable to new geographical regions (with focus on compliance, business ethics, data protection, environment, safety and employment), comparing it with pre-existing internal instruments. The aim is to assess the need to adapt or reinforce Navigator's internal procedures, ensuring it complies with the law and that its internal control system is coherent with all the jurisdictions where is operates.
Public Affairs Talks	Executed and planned	Own operations, upstream and downstream, in Portugal	Ongoing action	Initiative devoted to reflection on topics of European and national regulatory agenda with direct impact on Navigator's business. First edition held in May 2025, with the theme - the EU Affordable Energy Action Plan It addressed the potential impact on our Company and the sector in general.
Navigating Compliance: Let's talk about…	Executed and planned	Own operations, in Portugal	Ongoing action	This initiative involved developing and distributing monthly awareness raising materials ("Let's Talk About...") in a one-pager format, designed to address, in simple and practical term, key issues relating to The Navigator Company's compliance policies and

Main actions: [ESRS 2.68a]	Status [ESRS 2.68a]	Scope of action [ESRS 2.68 b]	Time horizon [ESRS 2.68 c]	Results [ESRS 2.68 to ESRS 2.68e]
				principles, encouraging reflection and application of these principles in a professional setting. This initiative has helped build an organisational culture based on transparency, responsibility and normative compliance, strengthening the company's commitment to ethical and compliant conduct in all its business sectors.
Future Leaders Board	Executed and planned	Own operations, in Portugal	Ongoing action	This cross-Group project brings together Employees from different sectors and departments and promotes innovation, collaboration and fresh thinking on emerging issues. The challenge for Board 6.0 was to develop innovative proposals responding to an emerging and strategic issue for the organisations, promoting fresh perspectives and solutions with an impact across the Company - *How to boost the use of AI in Navigator operations in Forestry, Manufacturing and Sales?*
Training in Personal Data Protection	Executed and planned	Own operations	Ongoing action	Equip employees with theoretical and practical know-how on the subject opf personal data protection
Suppliers' Day	Executed and planned	Upstream operations, in Portugal	Started in 2015, ongoing	This year's slogan was "Together For a Carbon Neutral Future", and the meeting brought together more than 150 strategic Partners in the wood and biomass, chemicals, energy, logistics and specialist services sectors, in order to align priorities, share expectations and consolidate the role of the supply chain as a central axis for the energy, climate and industrial transition.
ESG practices questionnaire for materially relevant Suppliers of chemicals and packaging	Executed and planned	Operations upstream	Started in 2025, ongoing	25% response rate

Main actions:	Status	Scope of action	Time horizon	Results
[ESRS 2.68a]	[ESRS 2.68a]	[ESRS 2.68 b]	[ESRS 2.68 c]	[ESRS 2.68 to ESRS 2.68e]
Digital Bed	Executed and planned	Own operations, upstream and downstream value chain, in Portugal	Started in 2025, ongoing	The Navigator Digital Bed is a Navigator Group test bed designed to accelerate development, test and validate digital solutions applied to the forestry, pulp, energy and paper industries. It functions as a single entry point which provides physical, technical and technological infrastructures, as well as functional and project management support, enabling SMEs and start-ups to create, test and scale up products with TRL between 5 and 9. Through thematic areas such as IoT, robotics, AI/ML, data science, augmented reality, high-performing computing and industrial sensors, NDB promotes a collaborative ecosystem which combines real industrial capabilities with advanced digital platforms, boosting innovation, economic impact and technological modernisation of the sector.

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Further information on actions implemented under the GROWING project (MDR-A, ESRS 2.68 b/c/e, ESRS 2.69 b/c): Chap. 5.3.1
- Further information on actions implemented in connection with Supplier management (MDR-A, ESRS 2.68 b/c/e, ESRS 2.69 b/c): Chap. 5.3.2

5.4.1.3. Targets and metrics

5.4.1.3.1. Tracking effectiveness of policies and actions through targets (MDR-T)

Our 2030 Roadmap **establishes several targets** relating to Navigator's **Suppliers chain**. The targets set by Navigator are aligned with several Sustainable Development Goals (SDGs), adding to the Company’s commitment to responsible practices.

SDG 17 (target 17.16) is consistent with the targets for promoting financial and ESG assessment of Suppliers, and also for promoting partnerships for the use of more sustainable means of transport, insofar as they all promote strategic collaboration and multi-sectoral partnerships for sustainability. Financial and ESG assessment of Suppliers also contributes to **SDG 8** (targets 8.4 and 8.7), by encouraging efficient use of resources and eradication of inappropriate employment practices. These initiatives also strengthen **SDG 12** (targets 12.2 and 12.6), promoting adoption of sustainable business practices and efficient management of natural resources. In addition, by integrating ESG criteria in the Supplier relationship, we are acting in line with **SDG 13** (targets 13.1 and 13.3), reinforcing resilience and the capacity to mitigate climate impacts. **SDG 16** (targets 16.5, 16.6, 16.7 and 16.b) promote sustainable practices in the Supplier chain, and ensure that ESG criteria are integrated in investment and financing policies, as well as in Navigator's risk management. **SDG 15** (target 15.2) is also addressed, ensuring responsible management of forests and natural resources. Lastly, ESG assessment of Suppliers includes issues relating to efficient water use, contributing to **SDG 6** (target 6.4) by encouraging more sustainable use of this resource. [ESRS 2.80f]

Goal and target	Scope [ESRS 2.80d]	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75 ESRS 2.80b]	Performance 2023 [ESRS 2.80J]	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
Promote financial assessment of materially relevant Suppliers, on an annual basis, in order to ensure the sustainability of Navigator's supplies.	Transversal	Benchmark value: - Baseline: 2024	% of Suppliers with financial assessment	Goal defined in 2023.	100% of materially relevant suppliers assessed	100% of materially relevant suppliers[46] assessed	Value/outcome to achieve: 100% of materially relevant suppliers Year: 2030
Assessment of ESG performance (decarbonisation, water management and respect for human rights) by materially relevant Suppliers	Upstream and downstream in value chain	Benchmark value: Suppliers of chemicals and packaging: 0%; Suppliers of logistics and transport: 25% of materially relevant Suppliers. Baseline: 2023	% of Suppliers with ESG assessment	Goal defined in 2023.	100% of materially relevant Suppliers of chemicals and packaging assessed; 100% of materially relevant Suppliers of logistics and transport assessed.	100% of materially relevant Suppliers of chemicals and packaging assessed; 100% of materially relevant Suppliers of logistics and transport assessed. [47]	Value/outcome to achieve: 100% for suppliers of chemicals and packaging; 80% for suppliers of logistics and transport. Year: 2025
Materially relevant contracts covered by Navigator's Code of Conduct for Suppliers	Upstream and downstream in value chain	Suppliers of logistics and transport: 0% Wood suppliers: 0% Suppliers of chemicals and packaging: 100% Baseline: 2023	% of contracts	-	100%	100% of new contracts	Value/outcome to achieve: 100% Year: 2026
Establish a programme to support our	Transversal	Benchmark value: - Baseline:	-	Goal defined in	Suppliers of logistics and transport: For	Suppliers of logistics and transport: Will	Value/outcome to achieve:

[46] Materially relevant suppliers of chemicals and packaging – accounting for around 80% of total spend.

Materially relevant suppliers of logistics and transport – accounting for around 80% of volume (in number).

Materially relevant suppliers of wood – accounting for around 80% of the volume of wood supplied (m^3).

[47] The assessment, based on Moody's ESG rating, is conducted annually. However, incorporation into the supplier assessment model and subsequent reporting to partners is completed by the end of 1st quarter of each year.

Goal and target	Scope [ESRS 2.80d]	Baseline [ESRS 2.80d]	Associated metric [ESRS 2.75 ESRS 2.80b]	Performance 2023 [ESRS 2.80J	Performance 2024 [ESRS 2.80J]	Performance 2025 [ESRS 2.80J]	Results to achieve [ESRS 2.80e]
Suppliers in developing plans for decarbonisation, water management and respect for human rights		2023		2023.	2024 it was not possible to develop a plan. Will be a target for 2026. Wood suppliers: In 2024 a decarbonisation plan was drawn up through to 2033, within European Union scope 3.	be a target for 2027 Wood suppliers: Implementation of decarbonisation plan.	- Year: 2026
Promote partnerships for use of more sustainable means of transport (own and Suppliers')	Transversal	Benchmark value: - Baseline: 2023	-	Goal defined in 2023.	Suppliers of logistics and transport: Consolidation of maritime service to central/northern France with Wec Lines, developing deliveries by sea, instead of road, resulting in an emissions reduction of 786 t CO_2 in 2024; Wood suppliers: Area decarbonisation plan drawn up, envisaging partnerships.	Suppliers of logistics and transport: Consolidation of maritime service to central/northern France with Wec Lines, developing deliveries by sea, instead of road, resulting in an emissions reduction of 600 t CO_2 in 2025; Wood suppliers: Implementation of decarbonisation plan.	Value/outcome to achieve: - Year: 2026
Hold each year between 30 and 40 interactions with representatives of relevant Stakeholder groups, at national and/or European level, by 2030 (goal reformulated in 2025)	Transversal	Baseline: 2022	No. interactions	More than 10 interactions with Portuguese members of parliament and MEPs	54 interactions (national and international)	108 interactions (national and international)	Between 30 and 40 interactions annually.

The target of promoting a financial assessment of materially relevant Suppliers on an annual basis, ensuring the sustainability of supplies, although not related to any policy in place in the Company, is intended to provide a regular analysis of the financial health of the main Suppliers. In order to set this target, Suppliers of wood and outbound logistics were classified on the basis of the volume of wood delivered and the number of transports effected, respectively, and the financial assessment was conducted using the Moody's tool. This analysis included indicators such as turnover, net income, EBITDA and share of Navigator's wallet, looking at the main Suppliers, responsible for approximately 80% of the volume of deliveries. The data used refers to the year available on the platform, corresponding to n-1, where n represents the reporting year. There was no Stakeholder involvement in setting the target. [ESRS 2.80a | ESRS 2.80f | ESRS 2.80h]

The target of assessing the ESG performance of materially relevant Suppliers by 2025, using the Moody's tool, ensuring assessment of 100% of Suppliers of chemicals and packaging and 80% of Suppliers of logistics and transportation is aligned with the Company's Decarbonisation Plan, Human Rights Policy and Environmental Policy, stepping up Navigator's commitment to sustainable practices in its supply chain. [ESRS 2.80a]

The target of ensuring that, by 2026, 100% of new materially relevant contracts are covered by the Code of Conduct for Suppliers is directly aligned with the Company's Code of Conduct for Suppliers. The inclusion of the Code of Conduct for Suppliers in all new contracts gas been adopted as a procedure, ensuring that Suppliers subscribe to the principles defined by Navigator. [ESRS 2.80a | ESRS 2.80f]

The target of establishing a programme, by 2026, for supporting Suppliers in developing plans for decarbonisation, water management and respect for Human Rights is aligned with the Company's Decarbonisation Plan, Human Rights Policy and Environmental Policy, strengthening Navigator's commitment to sustainable and responsible practices in its supply chain. In order to set this target, a study was conducted of the State of the Art in 2023/2024, taking 2020 as the reference year, identifying areas for improvement and establishing action plans aligned with the decarbonisation process. [ESRS 2.80a | ESRS 2.80f]

The target of promoting partnerships by 2026 for the use of more sustainable means of transport, operated both by the Company and by Suppliers, is also aligned with the Company's Decarbonisation Plan, strengthening its commitment to cutting emissions in the logistics sector. In order to set this target, a study was conducted of the State of the Art in 2023/2024, with 2020 as the reference year, identifying areas for improvement and establishing action plans for the decarbonisation process. The solutions analysed included the possibility of partnerships for adoption of biofuels and renewal of fleets and equipment. We also pressed ahead with projects in collaboration with existing Partners, in particular for the creation of more sustainable transport solutions, including use of short sea shipping, especially in services to France, making it possible to switch cargo from road to sea. However, no interim targets relating to this goal were set. [ESRS 2.80a | ESRS 2.80f]

The target of Interactions with representatives of major Stakeholder groups was adjusted to reflect the natural evolution of our goals, ensuring coherence with Navigator's current situation and the strategic context in which the Company operates. [ESRS 2.80a | ESRS 2.80f]

The following information is incorporated by reference to other parts of the Non-Financial Statement:

- Further information on the target for continuous monitoring of the main motivational stimuli for Employees (MDR-T, ESRS 2.80): Chap. 5.3.1

5.4.1.3.2. Incidents of corruption or bribery (G1-4)

No cases of violation of the anti-corruption and anti-bribery procedures and rules were confirmed in 2025, nor were any fines applied for offences against anti-corruption and anti-bribery laws. [G1-4.24a]

Following on from events in 2020 and 2021, borne out by the criminal investigation in 2020 into alleged corruption in wood reception activities at one of our production centres, leading to dismissal of the Workers involved, judicial proceedings are still in

progress in the labour and criminal courts. In effect, Navigator continued in 2025 to follow through the cases in the labour courts where 28 Workers allege unfair dismissal; no further progress has been made in these proceedings. At the same time, in the criminal courts, Navigator continues to follow the proceedings as a civil party; the case has gone to trial and the taking of evidence has started, continuing throughout 2025. [G1.24b]

5.4.1.3.3. Expenditure relating to local Suppliers (entity-specific disclosure, MDR-M)

In addition to the metrics to be reported under the ESRS, Navigator monitors a series of additional metrics which assist in analysis of its performance. We remain actively committed to development of the Communities where we operate, prioritising the use of local Suppliers whenever possible. This approach not only strengthens the national economy, but also contributed to creating shared value and building more sustainable and resilient supply chains. [ESRS 2.77a | ESRS 2.77c]

The "Expenditure relating to local suppliers" metric enables us to assess the proportion of purchasing from Suppliers based in Portugal, out of Navigator's total purchasing. This analysis includes the proportion of the purchasing budget allocated to relevant operational units and the total number of Suppliers counted at 31 December 2025. [ESRS 2.77a | ESRS 2.77c]

The methodology used is in line with GRI 204-1. considering total expenditure on Suppliers, expressed in thousand euros, including VAT. These figures are aligned with the Consolidated income statement in Navigator's Annual Report, ensuing that the information reported is coherent. [ESRS 2.77a | ESRS 2.77c]

In view of the strategic importance of this metric, Navigator will continue to monitor and optimise its contracting policies, increasing its positive impact on the local economy and on the sustainability of its business model.

[ESRS 2.77a | ESRS 2.77c | ESRS 2.77c] – Entity-specific metrics

Expenditure on local suppliers	2025	2024	2023
Total no. of Suppliers	7,829	7,718	7,490
% of local Suppliers	71%	70%	73%
% of foreign Suppliers	29%	30%	27%
Total expenditure on suppliers ('000 €)	1 883 527	1 937 431	1 793 052
% of expenditure on local Suppliers	69%	75%	74%
% of expenditure on foreign Suppliers	31%	25%	26%

6. Proposed allocation of profits

Considering that the individual accounts show net income of 144 667 435.16 Euros, determined on an IFRS basis:

The Board of Directors proposes that these profits be allocated as follows:

Dividends for shares in issue. 79 993 871.60 Euros
(0.11248 Euros per share)

Employee profit sharing for the period up to ..... 9 000 000.0 Euros*

Retained Earnings ..... 55 673 563.56 Euros

* already stated in financial statements

7. Declaration required under Article 29-G.1 c) of the Securities Code

Article 29-G.1 c) of the Securities Code requires that each of the persons responsible for issuers, whose names and duties must be clearly indicated, make a number of declarations, as described in the sub-paragraph in question. In the case of The Navigator Company, a uniform declaration has been adopted, worded as follows:

"I hereby declare, under the terms and for the purposes of Article 29-G.1 c) of the Securities Code that, to the best of my knowledge, the management report, annual accounts, legal accounts certificate and other financial statements required by law or regulation, even if they have not been submitted for approval at the general meeting, of The Navigator Company, S.A., for the financial year of 2025, were drawn up in accordance with the relevant accounting rules, and provide a true and fair view of the assets and liabilities, financial affairs and profit or loss of the Company and other companies included in the consolidated accounts, and that the management report contains a faithful account of the business, performance and position of the Company and other companies included in the consolidated accounts, describing the main risks and uncertainties which they face."

As required by this rule, we provide below a list of the persons signing the declaration and their office in the company:

Ricardo Miguel dos Santos Pacheco Pires	Chairman of the Board of Directors
António José Pereira Redondo	Chief Executive Officer
José Fernando Morais Carreira de Araújo	Executive director
Nuno Miguel Moreira de Araújo dos Santos	Executive director
João Paulo Cabete Gonçalves Lé	Executive director
Dorival Martins de Almeida	Executive director
António Quirino Soares	Executive director
Ana Teresa Cunha de Pinho Tavares Lehmann	Non-executive director
Hugo Alexandre Lopes Pinto	Non-executive director
Maria Isabel da Silva Marques Abranches Viegas	Non-executive director
Maria Teresa Aliu Presas	Non-executive director
Mariana Rita Antunes Marques dos Santos	Non-executive director

Vitor Paulo Paranhos Pereira	Non-executive director
Maria da Luz Gonçalves de Andrade Campos	Chair of Audit Board
José Manuel de Oliveira Vitorino	Member of the Audit Board
Jorge Manuel Araújo de Beja Neves	Member of the Audit Board

8. Our Performance

The tables in the following sub-chapters provide a summary of the economic, environmental and social indicators. Please refer to the relevant framework information in the relevant Non-Financial Statement chapters.

8.1. Economic indicators

Economic Indicators	2025	2024	2023	GRI	ESRS	Chap.
Total sales (million €)	**1 969**	**2 088**	**1 953**			**4**
EBITDA[48] (million €)	**376**	**547**	**502**			
Operating profits (EBIT)	208	379	366			
Financial results	-31,9	-25.8	-19			
Net income (million €)	**145**	**287**	**275**			**4**
Operanting Cash flow	313	455	410			
Free cash flow[49]	89	23	92			
Capital expenditure	210	241	187			
Interest Bearing Net Debt[50]	704	617	490			
EBITDA/Sales (%)	**19**	**26**	**26**			**4**
ROCE[51]	10%	20%	21%			
ROE[52]	10%	22%	21%			
Interest Bearing Net Debt /EBITDA[53]	1.87	1.13	0.98			
Direct Economic Value Generated - Revenue (I) (thousand €)	**2 060 208**	**2 188 933**	**2 033 559**	**201-1**		**2.3**
Direct Economic Value Distributed (II) (thousand €)	**1 844 838**	**1 824 737**	**1 848 089**			
Operating costs	1 419 894	1 384 528	1 294 457			
Employee pay and benefits	216 643	202 709	171 127			
Payments to capital providers	206 937	175 835	219 305			
Taxes	70 965	60 065	161 741			
Community investment	1 364	1 600	1 459			

[48] Operating profits + depreciation + provisions.

[49] Variation net debt + dividends + purchase of own shares.

[50] Interest-bearing liabilities - liquid assets (not including effect of IFRS 16).
[51] ROCE = Annualised operating results/ Average Capital invested (N+(N-1))/2

[52] ROE = Annualised net income/ Average Equity (N+(n-1))/2

[53] (Interest-bearing liabilities – liquid assets) / EBITDA corresponding to the last 12 months; IFRS Impact 16: Net Debt / EBITDA 2024 of 1.3; Net Debt / EBITDA 2024 of 1.1.

Economic Indicators	2025	2024	2023	GRI	ESRS	Chap.
Accumulated Economic Value (I-II) (thousands of €)	**144 405**	**364 196**	**185 470**			
Financial support from the Government (thousand of €)	**28 126**	**17 958**	**16 781**	**201(4)**		
Tax Incentives / Credits	2 678	3 952	1 701			
Subsidies	21 504	10 814	12 280			
Support for research and R&D	3 944	3 192	2 800			
Total number of Suppliers	**7 829**	7 718	7 490		MDR-M	5.4.1.3.3
Percentage of local Suppliers (%)	71	70	73			
Total expenditure on suppliers (€)	**1 883 527**	1 937 431	1 793 052	204-1	MDR-M	5.4.1.3.3
% expenditure on local suppliers	69	75	74			

8.2. Environmental indicators

Environmental indicators	2025	2024	2023	GRI	ESRS	Chap.
Forest						
% of Forest Area Managed with Certification, in Mainland Portugal	**100**	**100**	**100**		**MDR-M**	**5.2.6.3**
Wood purchased with FSC and PEFC certification					**MDR-M**	**5.2.6.3**
% Portuguese	79	73	68			
% overall	84	73	69			
Materials						
Raw Materials (tons)[54]	**5 877 755**	**5 241 400**	**4 714 216**	**301-1**		
Renewables	5 214 409	4 569 007	4 251 275			
Non-renewables	663 346	672 361	462 940			
% renewable raw materials	89	87	90			
% of recycled materials used	0.04	0.00	0.00	301-2		
Energy						
Energy consumption within the organisation (GJ)	**42 245 169**	**41 376 730**	**39 746 832**	**302-1**	**E1-5**[55]	**5.2.2.3.2**
Primary energy from non-renewable sources	8 784 929	8 392 059	7 788 102			
Primary energy from renewable sources	32 381 967	32 234 878	31 688 941			
Electricity acquired for consumption	4 305 832	4 922 607	5 400 128			
Electricity sold	3 292 015	4 172 815	5 130 339			

[54] Revised methodology for greater alignment with ESRS, now including UWF and Tissue packaging materials, compounds associated with production (retention, resistance and bleaching agents), lubricants and materially relevant MROs (maintenance, repair and operation).

[55]Data available in MWh.

Environmental indicators	2025	2024	2023	GRI	ESRS	Chap.
% primary renewable energy consumed	79	79	80			
% of primary renewable energy consumed in Portugal[56]	79	80	81			
Energy intensity in Portugal (GJ/t output)[57]	**13.7**	**12.8**	**12.9**	**302-3**		
Reduction in energy consumption (GJ)	**19 397**	**19 483**	**5 604**	**302-4**		
Water [58]						
Water intake (thousand m^3)	**62 194**	**63 033**	**61 989**	**303-3**	**E3-4**	**5.2.3.3.2**
Industrial operations	59 460	60 799	60 096			
Forestry operations	2 629	2 230	1 892			
Specific water use in industrial operations in Portugal (m^3/t)	**20.5**	**20.5**	**21.2**		**MDR-M**	
Biodiversity						
Facilities in or close to protected areas and areas of high biodiversity value				**101-6**	**MDR-M**	**5.2.4.3**
National Network of Protected Areas (RNAP) (ha)	7 660	**7 608**	**11 877**			
% of total holdings managed	7	7	11			
Classified sites in Natura 2000 Network (ha)	27 209	26 996	44 990			
% of total holdings managed	25	25	42			
Special Protection Zones (ZPE) in the Natura 2000 Network (ha)	20 539	20 359	33 680			
% of total holdings managed	19	19	31			
Total classified areas (ha)	**55 408**	**54 963**	**56 684**		**MDR-M**	**5.2.4.3**
% of total holdings managed	50	50	53			
Habitats protected or restored (ha)	**4 759**	**4 597**	**4 611**		**MDR-M**	**5.2.4.3**
Protected habitats (ha)	4 647	4 474	4 420			
Restored habitats (ha)	112	123	191			
Emissions[59]						
Scope 1 (tCO_2e)	**531 204**	**508 250**	**508 833**	**305-1**	**E1-6**	**5.2.2.3.3**
Assets at plants (CELE scope)	485 054	452 756	457 990			
Other scope 1 emissions	46 150	55 494	50 843			

[56] Primary renewable energy consumed includes, since 2021, electricity produced in photovoltaic solar power plants.

[57] The calculation of energy intensity took into account energy consumption by primary sources (excluding energy from Biomass Thermoelectric Plants - BTC) and the total quantity of products manufactured. The energy used by BTCs is included in the total energy consumed, but these figures are not taken into account when calculating energy intensity, since this consumption is not related to the production process.

[58] These indicators do not include Navigator Tissue UK.
[59] The GHG Protocol guidelines were followed.
Scope 1, 2 and 3 emissions include emissions from all Navigator activities in all geographies, except emissions associated with international offices, due to their low materiality (<0.02%). Emissions from Navigator Tissue UK, integrated into Navigator in May 2024, were included in scopes 1 and 2, and are expected to be extended to scope 3 next year.

Environmental indicators	2025	2024	2023	GRI	ESRS	Chap.
Scope 2 (tCO_2e)				**305-2**	**E1-6**	**5.2.2.3.3**
Purchase of electrical power (location-based)	81 308	140 633	230 642			
Scope 3 (tCO_2e)	**1 541 636**	**1 388 883**	**1 397 752**	**305-3**	**E1-6**	**5.2.2.3.3**
Category 1: Purchased goods and services	962 495	856 601	792 005			
Category 3: Fuel- and Energy-Related Activities (not included in scope 1 or 2)	92 501	90 324	100 052			
Category 4: Upstream Transportation and Distribution	103 934	95 383	90 208			
Category 9: Downstream Transportation and Distribution	88 448	96 808	116 597			
Category 10: Processing of Sold Product	112 954	102 467	154 224			
Category 12: End-of-Life Treatment of Sold Products	181 304	147 402	144 667			
Reduction in GHG emissions as direct result of initiatives undertaken (tCO_2e)	**165 600**	**11 415**	**12 230**	**305-5**		
Waste						
Total waste generated (t)	**492 797**	**446 601**	**441 642**	**306-3**	**E5-5**	**5.2.5.3.3**
Recovery	267 707	300 927	296 348			
Disposed of	225 091	145 674	148 587			
Non-hazardous waste (t)	**491 647**	**455 622**	**440 709**		**E5-5**	**5.2.5.3.3**
Recovery	266 964	300 307	295 687			
Disposed of	224 683	145,315	148 316			
Hazardous waste (t)	**1 150**	**979**	**933**		**E5-5**	**5.2.5.3.3**
Recovery	742	620	662			
Disposed of	408	359	271			
Rate of disposal of waste in industrial landfill in Portugal (%)	**16**	**12**	**12**		**MDR-M**	**5.2.5.3.1**

Other scope 1 emissions include emissions from industrial assets outside the ETS scope, emissions from fluorinated gases, methane, nitrous oxide and emissions from own fleet travel.

The 2024 data, including EU ETS emissions, fluorinated gases, methane and nitrous oxide, were updated and incorporated the ETS verification that occurred after the publication of the 2024 Annual Report, information which was previously not available. The materiality of this update is less than 0.2%.

Scope 2 location-based emissions were calculated based on the most recent International Energy Agency (IEA) emission factors. Market-based emissions consider the emission factors of traders, as well as the supply of 100% renewable energy under PPA – Power Purchase Agreement. The 2024 values are provisional, since the final values of the emission factors are not yet available.

In scope 3, categories 2, 5, 6 and 7 are excluded, due to their low materiality. Navigator conducted a materiality analysis in 2022, and these categories were identified as non-material. Categories 8, 11, 13, 14 and 15 are excluded, due to the non-applicability to Navigator's business.

Additional indicators

The additional indicators below appear in this chapter alone and are therefore provided with the necessary contextual information.

Indicator name	2025	2024	2023	GRI
Water				
Emissions to water (t)[60]				
Total Suspended Solids (TSS)	1 053	1 286	1 012	
Chemical Oxygen Demand (COD)	13 883	15 047	13 085	
Biological Oxygen Demand (BOD)	488	745	639	
Total Nitrogen	167	166	164	
Total Phosphorus	74	74	84	
AOX	169	181	151	
Air				
Atmospheric emissions (t)[61]				**3 057**
Nitrogen oxides (NOX)	1 405	1 783	1 780	
Sulphur Dioxide (SO_2)	114	83	64	
Particles	104	264	198	
Emissions of ozone-depleting substances (ODS) (kg CFC-11e)				**305-6**
Production	0	0	0	
Import	0	0	0	
Export	0	0	0	

In 2025, liquid pollutant emissions fell compared to 2024, returning to levels witnessed in 2023, following the unusually high values in the previous year. In all industrial units. The emission limit values (ELVs) were fully met, highlighting the good performance of the wastewater treatment plants (WWTPs).

All industrial complexes have their own sewage treatment plants, except Navigator Tissue Ejea and Navigator Tissue UK, where wastewater treatment is carried out externally. The WWTPs include primary and secondary treatment, and the Vila Velha de Ródão unit also includes a phase dedicated to phosphorus removal. The Setúbal No. 2 WWTP includes a membrane bioreactor

[60] Annual quantities of the main liquid pollutants (TSS, COD, BOD_5, nitrogen and phosphorus) in the treated effluent discharged from the wastewater treatment plants at Navigator's industrial sites. They do not include Navigator Tissue Ejea or Navigator Tissue UK, where effluent treatment is ensured by third parties. The data result from continuous monitoring of the main sources or from specific samples (daily or weekly) analysed in the laboratory, according to the methodologies defined in the environmental licenses of each facility. For low-emission sources, periodic measurements are performed by an accredited laboratory. When there is no monitoring in the relevant year, emissions are estimated based on the last available measurement, adjusted for operating hours. Spot measurements are extrapolated to the reporting year.

[61] Annual quantities of the main air pollutants (NOx, SO_2 and Particles) generated by Navigator's industrial activities in Portugal and Spain. As for the United Kingdom there are no emissions of these pollutants. The data result from continuous monitoring of the main sources or from specific measurements carried out periodically by accredited entities, according to the methodologies defined in the environmental licenses of each facility. For sources with spot measurements, the values are extrapolated to the reporting year.

ultrafiltration (MBR) system since 2023, leading to significant improvements in this facility's effluent treatment performance. In 2025, this solution helped reduce the organic load of the treated effluent by around 77% compared with pre-project levels.

In 2025, atmospheric emissions fell compared to 2024 and full compliance with the applicable emission limit values (ELVs) was maintained. The values presented include all Navigator operations, except Navigator Tissue UK, where there are no materially relevant emission sources.

A key development during the period under review was the launch of the **new system for the collection and recovery of diluted non condensable gases (DNCG)**[62], which are sent for flaring in Recovery Boiler 4 (CR4) at the Setúbal Industrial Complex. This system replaces the old recovery boiler (CR3), in operation since 1989, which had technological and environmental limitations, namely management of diluted foul odorous gases from assorted sources. The replacement of CR3 by CR4 made it possible to implement the best available techniques (BAT), improve the energy and chemical efficiency of the recovery process and reduce emissions of CO_2, SO_2, NOx, particles and odours. The project also helps increase steam and renewable electricity production, integrating natural gas burners with the future possibility of using hydrogen. This initiative reinforces Navigator's decarbonisation goals, energy efficiency and environmental impact reduction, and significant reduction in the perception of odours in the surrounding areas of the Setúbal Industrial Complex.

It is also highlighting the installation of a **system to remove chlorides and potassium from the recovery boiler ashes in the Aveiro Industrial Complex**. Ashes collected in electro-filters are sent to conveyors to be reused in the process or forwarded for treatment. Removing these compounds allows the ash to be reused in the chemical recovery process of sodium salts, reducing the need for replacement chemicals – notably sulphate and sodium hydroxide – whilst simultaneously minimising the risk of boiler corrosion.

8.3. Social indicators

Social indicators	2025	2024	2023	GRI	ESRS	Chap.
Human Resources						
Number of employees	**3 932**	**3 965**	**3 467**	**2-7**	**S1-6**	**5.3.1.3.2**
Permanent contract	**3 630**	**3 717**	**3 279**			
Men	2 933	3 021	2 686			
Women	697	696	593			
Fixed-term contract	302	248	188			
Men	237	192	135			
Women	65	56	53			
Safety and Health[63]				**403-9**		
Number of accidents at work	**182**	159	228		S1-14	5.3.1.3.8

[62] Project carried our under the Decarbonisation Roadmap and supported by the RRP. For further information, see chapter E1-5.
[63] According to the GRI criteria, serious occupational accidents are injuries which the Employee will not recover from or is expected not to recover from fully within a maximum period of 6 months to his/her health condition before the accident. According to the GRI criteria, it includes all accidents with the following possibles outcomes: deaths, accidents with sick leave, accidents that result in loss or reduction of ability to work or transfer to another function, accidents that lead to medical treatment in addition to first aid, loss of consciousness, serious injury diagnosed by a doctor or other qualified health professional. It can also be referred to as TRI (Total Recordable Incidents). Note 2: To calculate the index, the normalisation factor of hours worked of 1,000,000 was used. Methodological notes on the calculations made: Formulas: • Death rate resulting from occupational accidents = (No. of deaths resulting from occupational accidents/ No. of hours worked) x 1,000,000 • Frequency Index = (No. of accidents with sick leave / No. of hours worked) x 1,000,000. The data presented concern the activities in Portugal and Spain.

Social indicators	2025	2024	2023	GRI	ESRS	Chap.
Frequency rate	**2.8**	4.1	5.8		S1-14	5.3.1.3.8
Index of fatalities as a result of work-related injury	**0.0**	0.0	0.0			
Training and Development						
Training hours per Employee	**90**	**93**	**78**	**404-1**	**S1-13**	**5.3.1.3.7**
By gender						
Men	97	100	84			
Women	62	64	53			
Performance assessment (%)	**98**[64]	77	99	404-3	S1-13	5.3.1.3.7
By gender						
Men	98	92	99			
Women	98	89	100			
Diversity						
% of women in the organisation	**19.4**	**19.0**	**19.0**		**S1-6**[65]	**5.3.1.3.2**
Employees by age (%)				**405.1**	**S1-9**[66]	**5.3.1.3.5**
< 30 years	13.9	14.1	13.0			
30–50 years old	61.5	61.7	61.8			
>50 years	24.5	24,2	25.2			

[64] The data presented refers to 2024, as the 2025 Performance Management Cycle is not yet complete. All Employees in Portugal, Mozambique, international offices and Ejea were considered, and Ejea's operational technicians and the *tissue* unit in the United Kingdom were not covered.

[65] Data available on the total number of women in the organisation.

[66] Data available on the total number of workers by age group.

9. Annexes

9.1. Correspondence Tables

9.1.1. ESRS

ESRS 2 IRO-2 - ESRS disclosure requirements covered by the company's sustainability statement

Disclosure Requirement	Location
ESRS 2 - General Disclosure	
BP-1 - General basis for the preparation of sustainability statements	Chap. 5.1.1.1
BP-2 - Disclosures relating to specific circumstances	Chap. 5.1.1.2 Chap. 9.1.1
GOV-1 - Role of the administrative, management and supervisory bodies	Chap. 5.1.2.1
GOV-2 - Information provided on sustainability issues dealt with by the company's administrative bodies	Chap. 5.1.2.2
GOV-3 - Integrating sustainability performance into incentive schemes	Chap. 5.1.2.3
GOV-4 - Statement on due diligence	Chap. 9.1.1
GOV-5 - Risk management and internal controls over sustainability reporting	Chap. 5.1.2.4
SBM-1 - Strategy, business model and value chain	Chap. 5.1.3.1
SBM-2 - Interests and views of stakeholders	Chap. 5.1.3.2
SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and the business model	Chap. 5.1.3.3 Chap. 5.2.2.1.1 Chap. 5.2.3.1.1 Chap. 5.2.4.1.1 Chap. 5.2.5.1.1 Chap. 5.2.6.1.1 Chap. 5.3.1.1.1 Chap. 5.3.2.1.1 Chap. 5.3.3.1.1 Chap. 5.4.1.1.1
IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities	Chap. 5.1.4.1
IRO-2 - Disclosure Requirements in ESRS covered by the undertaking’s sustainability statement	Chap. 5.1.4.2 Chap. 9.1.1
E1 - Climate Change:	
ERS 2 GOV-3 - Integrating sustainability performance into incentive schemes	Chap. 5.1.2.3
E1-1 - Transition plan for climate change mitigation	Chap. 5.2.2.1.2
ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and the business model	Chap. 5.2.2.1.1
ESRS 2 IRO-1 - Description of processes to identify and assess climate-related material impacts, risks and opportunities	Chap. 5.1.4.1
E1-2 - Policies related to climate change mitigation and adaptation	Chap. 5.2.2.2.1

ESRS 2 IRO-2 - ESRS disclosure requirements covered by the company's sustainability statement

Disclosure Requirement	Location
E1-3 - Actions and resources related to climate change policies	Chap. 5.2.2.2.2
E1-4 - Targets related to climate change mitigation and adaptation	Chap. 5.2.2.3.1
E1-5 - Energy consumption and mix	Chap. 5.2.2.3.2
E1-6 – Gross Scope 1, 2, 3 and total GHG emissions	Chap. 5.2.2.3.3
E1-9 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Chap. 5.2.2.3.4
E3 - Water and marine resources (WMR)	
ESRS 2 IRO-1 - Description of processes to identify and assess material impacts, risks and opportunities related to water and marine resources	Chap. 5.1.4.1
E3-1 - Policies related to water and marine resources	Chap. 5.2.3.2.1
E3-2 - Actions and resources related to water and marine resources	Chap. 5.2.3.2.2
E3-3 - Targets related to water and marine resources	Chap. 5.2.3.3.1
E3-4 - Water consumption	Chap. 5.2.3.3.2
E3-5 - Anticipated financial effects from water and marine resources-related risks and opportunities	Chap. 5.2.3.3.3
E4 - Biodiversity and ecosystems	
E4-1 - Transition plan and integration of biodiversity and ecosystems in the strategy and business model	Chap. 5.2.4.1.2
ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and the business model	Chap. 5.2.4.1.1
ESRS 2 IRO-1 - Description of processes to identify and assess material impacts, risks and opportunities related to biodiversity and ecosystems	Chap. 5.1.4.1
E4-2 - Policies related to biodiversity and ecosystems	Chap. 5.2.4.2.1
E4-3 - Actions and resources related to biodiversity and ecosystems	Chap. 5.2.4.2.2
E4-4 - Targets related to biodiversity and ecosystems	Chap. 5.2.4.3.1
E4-5 - Impact metrics related to changes in biodiversity and ecosystems	Chap. 5.2.4.3.2
E4-6 - Anticipated financial effects of risks and opportunities related to biodiversity and ecosystems	Omitted in accordance with Appendix C of ESRS 1
E5 - Resource use and circular economy	
ESRS 2 IRO-1 - Description of processes for identifying and assessing material impacts, risks and opportunities related to the use of resources and the circular economy	Chap. 5.1.4.1
E5-1 - Policies related to resource use and circular economy	Chap. 5.2.5.2.1
E5-2 - Actions and resources related to resource use and circular economy	Chap. 5.2.5.2.2
E5-3 - Targets related to resource use and circular economy	Chap. 5.2.5.3.1
E5-4 - Resource inflows	Chap. 5.2.5.3.2
E5-5 - Resource outflows	Chap. 5.2.5.3.3
E5-6 - Anticipated financial effects from resource use and circular economy-related risks and opportunities	Omitted in accordance with Appendix C of ESRS 1

ESRS 2 IRO-2 - ESRS disclosure requirements covered by the company's sustainability statement

Disclosure Requirement	Location
ESRS S1 – Own workforce	
ESRS 2 SBM-2 - Interests and views of stakeholders	Chap. 5.1.3.2
ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and the business model	Chap. 5.3.1.1.1
S1-1 - Policies related to own workforce	Chap. 5.3.1.2.1
S1-2 - Processes for engaging with own workforce and workers' representatives about impacts	Chap. 5.3.1.2.2
S1-3 - Processes to remediate negative impacts and channels for own workforce to raise concerns	Chap. 5.3.1.2.3
S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Chap. 5.3.1.2.4
S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Chap. 5.3.1.3.1
S1-6 - Characteristics of the undertaking's employees	Chap. 5.3.1.3.2
S1-7 - Characteristics of non-employee in the undertaking's own workforce	Chap. 5.3.1.3.3
S1-8 - Collective bargaining coverage and social dialogue	Chap. 5.3.1.3.4
S1-9 - Diversity indicators	Chap. 5.3.1.3.5
S1-10 - Adequate wages	Chap. 5.3.1.3.6
S1-13 - Training and skill development indicators	Chap. 5.3.1.3.7
S1-14 - Health and safety indicators	Chap. 5.3.1.3.8
S1-15 - Work-life balance metrics	Chap. 5.3.1.3.9
S1-16 - Compensation metrics (pay gap and total remuneration)	Chap. 5.3.1.3.10
S1-17 - Incidents, complaints and severe human rights impacts	Chap. 5.3.1.3.11
MDR-M - Metrics in relation to material sustainability matters	Chap. 5.3.1.3.12
S2 – Workers in the value chain	
ESRS 2 SBM-2 - Interests and views of stakeholders	Chap. 5.1.3.2
ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	Chap. 5.3.2.1.1
S2-1 - Policies related to value chain workers	Chap. 5.3.2.2.1
S2-2 - Processes for involving value-chain workers about impacts	Chap. 5.3.2.2.2
S2-3 - Processes to remediate negative impacts and channels for value chain workers to raise concerns	Chap. 5.3.2.2.3
S2-4 - Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Chap. 5.3.2.2.4
S2-5 - Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Chap. 5.3.2.3.1
MDR-M - Metrics in relation to material sustainability matters	Chap. 5.3.2.3.2
S3: Affected communities	
ESRS 2 SBM-2 - Interests and views of stakeholders	Chap. 5.1.3.2
ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and the business model	Chap. 5.3.3.1.1
S3-1 - Policies related to affected communities	Chap. 5.3.3.2.1

ESRS 2 IRO-2 - ESRS disclosure requirements covered by the company's sustainability statement

Disclosure Requirement	Location
S3-2 - Processes for engaging with affected communities about impacts	Chap. 5.3.3.2.2
S3-3 - Processes to remediate negative impacts and channels for affected communities to raise concerns	Chap. 5.3.3.2.3
S3-4 - Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, as well as the effectiveness of such actions	Chap. 5.3.3.2.4
S3-5 - Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Chap. 5.3.3.3.1
MDR-M - Metrics in relation to material sustainability matters	Chap. 5.3.3.3.2
G1 - Business conduct	
ESRS 2 GOV-1 - Role of the administrative, management and supervisory bodies	Chap. 5.1.2.1
ESRS 2 IRO-1 - Processes for identifying and evaluating material impacts, risks and opportunities	Chap. 5.1.4.1
G1-1- Business conduct policies and corporate culture	Chap. 5.4.1.2.1
G1-2 – Management of relationships with suppliers	Chap. 5.4.1.2.2
G1-3 - Procedures to address corruption and bribery	Chap. 5.4.1.2.3
G1-4 - Incidents of corruption or bribery	Chap. 5.4.1.3.2
MDR-A - Minimum Application Requirements for Actions	Chap. 5.4.1.2.4
MDR-T - Minimum Application Requirements for Targets	Chap. 5.4.1.3.1
MDR-M - Minimum Application Requirements for Metrics	Chap. 5.4.1.3.3
Entity-specific disclosures – Sustainable management of the forest	
MDR-P - Policies adopted to manage material sustainability matters	Chap. 5.2.6.2.1
MDR-A - Actions and resources in relation to material sustainability matters	Chap. 5.2.6.2.2
MDR-T - Tracking effectiveness of policies and actions through target	Chap. 5.2.6.3.1
MDR-M - Metrics in relation to material sustainability matters	Chap. 5.2.6.3.2

List of data points that derive from other EU legislation

Disclosure requirements	Datapoint	Description	Reference SFDR	Pillar 3 Reference	Benchmark Regulation of reference	EU climate legislation reference	Location	Materiality
ESRS 2 GOV-1	Paragraph 21 (d)	Board's gender diversity	X	-	X	-	Chap. 5.1.2.1	-
ESRS 2 GOV-1	Paragraph 21 (e)	Percentage of independent board members	-	-	X	-	Chap. 5.1.2.1	-
ESRS 2 GOV-4	Paragraph 30	Disclosure of mapping of information provided in sustainability statement about due diligence process	X	-	-	-	Chap. 9.1.1	-
ESRS 2 SBM-1	Paragraph 40 (d) i	Undertaking is active in fossil fuel	X	X	X	-	Chap. 5.1.3.1	-
ESRS 2 SBM-1	Paragraph 40 (d) ii	Undertaking is active in chemicals production	X	-	X	-	Chap. 5.1.3.1	-
ESRS 2 SBM-1	Paragraph 40 (d) iii	Undertaking is active in controversial weapons	X	-	X	-	Chap. 5.1.3.1	-
ESRS 2 SBM-1	Paragraph 40 (d) iv	Undertaking is active in cultivation and production of tobacco	-	-	X	-	Chap. 5.1.3.1	-
ESRS E1-1	Paragraph 14.	Disclosure of transition plan for climate change mitigation	-	-	-	X	Chap. 5.2.2.1.2	-
ESRS E1-1	Paragraph 16 (g)	Undertaking is excluded from EU Paris-aligned Benchmarks	-	X	X	-	Chap. 5.2.2.1.2	-
ESRS E1-4	Paragraph 34	GHG emission reduction targets	X	X	X	-	Chap. 5.2.2.3.1	-
ESRS E1-5	Paragraph 38	Energy consumption from fossil sources broken down by source (only sectors with a high climate impact)	X	-	-	-	Chap. 5.2.2.3.2	-
ESRS E1-5	Paragraph 37	Energy consumption and energy mix	X	-	-	-	Chap. 5.2.2.3.2	-
ESRS E1-5	Paragraphs 40-43	Energy intensity from activities in high climate impact sectors (total energy consumption per net revenue)	X	-	-	-	Chap. 5.2.2.3.2	-

Disclosure requirements	Datapoint	Description	Reference SFDR	Pillar 3 Reference	Benchmark Regulation of reference	EU climate legislation reference	Location	Materiality
ESRS E1-6	Paragraph 44	Gross Scopes 1, 2, 3 and Total GHG emissions	X	X	X	-	Chap. 5.2.2.3.3	-
ESRS E1-6	Paragraphs 53-55	GHG emissions intensity	X	X	X	-	Chap. 5.2.2.3.3	-
ESRS E1-7	Paragraph 56	Disclosure of GHG removals and storage	-	-	-	X	-	Non-material
ESRS E1-9	Paragraph 66	Exposure of the reference portfolio to climate-related physical risks	-	-	X	-	Chap. 5.2.2.3.4	
ESRS E1-9	Paragraph 66 (a)	Breakdown of monetary amounts by acute and chronic physical risk	-	X	-	-	Chap. 5.2.2.3.4	
ESRS E1-9	Paragraph 66 (c)	Disclosure of location of significant assets at material physical risk	-	X	-	-	Chap. 5.2.2.3.4	
ESRS E1-9	Paragraph 67 (c)	Total carrying amount of real estate assets by energy efficiency classes	-	X	-	-	Chap. 5.2.2.3.4	
ESRS E1-9	Paragraph 69	Degree of exposure of the portfolio to climate-related opportunities	-	-	X	-	Chap. 5.2.2.3.4	
ESRS E2-4	Paragraph 28	Quantity of each pollutant listed in Annex II of the E-PRTR Regulation emitted into air, water and soil	X	-	-	-	-	Non-material
ESRS E3-1	Paragraph 9	Water and marine resources	X	-	-	-	Chap. 5.2.3.2.1	
ESRS E3-1	Paragraph 13	Dedicated policy	X	-	-	-	Chap. 5.2.3.2.1	
ESRS E3-1	Paragraph 14.	Sustainable oceans and seas	X	-	-	-	-	Non-material
ESRS E3-4	Paragraph 28 (c)	Total recycled and reused water	X	-	-	-	-	Non-material
ESRS E3-4	Paragraph 29	Total water consumption in m³ as per net income from own operations	X	-	-	-	Chap. 5.2.3.3.2	-
ESRS 2- SBM3 - E4	Paragraph 16 (a) i	Disclosure of activities negatively affecting biodiversity sensitive areas	X	-	-	-	Chap. 5.2.4.1.1	-
ESRS 2- SBM3 - E4	Paragraph 16 (b)	Material negative impacts with regards to land degradation, desertification or soil sealing have been identified	X	-	-	-	Chap. 5.2.4.1.1	-

Disclosure requirements	Datapoint	Description	Reference SFDR	Pillar 3 Reference	Benchmark Regulation of reference	EU climate legislation reference	Location	Materiality
ESRS 2- SBM3 - E4	Paragraph 16 (c)	Own operations affect threatened species	X	-	-	-	Chap. 5.2.4.1.1	-
ESRS E4-2	Paragraph 24 (b)	Sustainable land or agriculture practices or policies have been adopted	X	-	-	-	Chap. 5.2.4.2.1	-
ESRS E4-2	Paragraph 24 (c)	Sustainable oceans or seas practices or policies have been adopted	X	-	-	-	-	Non-material
ESRS E4-2	Paragraph 24 (d)	Policies to address deforestation have been adopted	X	-	-	-	Chap. 5.2.4.2.1	-
ESRS E5-5	Paragraph 37 (d)	Non-recycled waste	X	-	-	-	-	Non-material
ESRS E5-5	Paragraph 39	Total amount of hazardous and radioactive waste	X	-	-	-	-	Non-material
ESRS 2- SBM3 - S1	Paragraph 14 (f)	Information about type of operations at significant risk of incidents of forced labour or compulsory labour	X	-	-	-	Chap. 5.3.1.1.1	-
ESRS 2- SBM3 - S1	Paragraph 14 (g)	Information about type of operations at significant risk of incidents of child labour	X	-	-	-	Chap. 5.3.1.1.1	-
ESRS S1-1	Paragraph 20	Description of relevant human rights policy commitments relevant to own workforce	X	-	-	-	Chap. 5.3.1.2.1	-
ESRS S1-1	Paragraph 21	Disclosure of whether and how policies are aligned with relevant internationally recognised instruments (ILO conventions 1 to 8)	-	-	X	-	Chap. 5.3.1.2.1	-
ESRS S1-1	Paragraph 22	Processes and measures to prevent human trafficking	X	-	-	-	Chap. 5.3.1.2.1	-
ESRS S1-1	Paragraph 23	Workplace accident prevention policy or management system is in place	X	-	-	-	Chap. 5.3.1.2.1	-
ESRS S1-3	Paragraph 32 (c)	Grievance or complaints handling mechanisms related to employee matters exist	X	-	-	-	Chap. 5.3.1.2.3	-
ESRS S1-14	Paragraph 88 (b) and (c)	Number of fatalities and number and rate of work-related accidents in own workforce as result of work-related injuries and work-related ill health	X	-	X	-	Chap. 5.3.1.3.8	-

Disclosure requirements	Datapoint	Description	Reference SFDR	Pillar 3 Reference	Benchmark Regulation of reference	EU climate legislation reference	Location	Materiality
ESRS S1-14	Paragraph 88 (e)	Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	X	-	-	-	Chap. 5.3.1.3.8	-
ESRS S1-16	Paragraph 97 (a)	Gender pay gap	X	-	X	-	Chap. 5.3.1.3.10	-
ESRS S1-16	Paragraph 97 (b)	Excessive remuneration ratio for executive directors	X	-	-	-	Chap. 5.3.1.3.10	-
ESRS S1-17	Paragraph 103 (a)	Number of incidents of discrimination	X	-	-	-	Chap. 5.3.1.3.11	-
ESRS S1-17	Paragraph 104 (a)	Non-compliance with UNGP on business and human rights and OECD guidelines	X	-	X	-	Chap. 5.3.1.3.11	-
ESRS 2- SBM3 – S2	Paragraph 11 (b)	Disclosure of geographies or commodities for which there is significant risk of child labour, or of forced or compulsory labour, among workers in undertaking's value chain	X	-	-	-	Chap. 5.3.2.1.1	-
ESRS S2-1	Paragraph 17	Commitment to the issue of human rights policies	X	-	-	-	Chap. 5.3.2.2.1	-
ESRS S2-1	Paragraph 18	Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour	X	-	-	-	-	Non-material
ESRS S2-1	Paragraph 19	Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights and Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve value chain workers	X	-	X	-	Chap. 5.3.2.2.1	-
ESRS S2-1	Paragraph 19	Due diligence policies on issues addressed by ILO Conventions 1 to 8	-	-	X	-	Chap. 5.3.2.2.1	-
ESRS S2-4	Paragraph 36	Disclosure of severe human rights issues and incidents connected to upstream and downstream value chain	X	-	-	-	Chap. 5.3.2.2.4	-
ESRS S3-1	Paragraph 16	Description of relevant human rights policy commitments relevant to affected communities	X	-	-	-	-	Non-material
ESRS S3-1	Paragraph 17	Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights and ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve affected communities	X	-	X	-	-	Non-material

Disclosure requirements	Datapoint	Description	Reference SFDR	Pillar 3 Reference	Benchmark Regulation of reference	EU climate legislation reference	Location	Materiality
ESRS S3-4	Paragraph 36	Disclosure of severe human rights issues and incidents connected to affected communities	X	-	-	-	-	Non-material
ESRS S4-1	Paragraph 16	Description of relevant human rights policy commitments relevant to consumers and/or end-users	X	-	-	-	-	Non-material
ESRS S4-1	Paragraph 17	Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users	X	-	X	-	-	Non-material
ESRS S4-4	Paragraph 35	Disclosure of severe human rights issues and incidents connected to consumers and/or end-users	X	-	-	-	-	Non-material
ESRS G1-1	Paragraph 10 (b)	UN Convention against Corruption	X	-	-	-	Chap. 5.4.1.2.1	-
ESRS G1-1	Paragraph 10 (d)	Protecting of whistleblowers	X	-	-	-	-	Non-material
ESRS G1-4	Paragraph 24 (a)	Amount of fines for violation of anti-corruption and antibribery laws	X	-	X	-	Chap. 5.4.1.3.2	-
ESRS G1-4	Paragraph 24 (b)	Prevention and detection of corruption or bribery	X	-	-	-	Chap. 5.4.1.3.2	-

ESRS 2 BP-2 - List of disclosure requirements/*data points* incorporated by reference

Disclosure requirements	ID	Location
List of disclosure requirements/data points incorporated by reference	BP-2	Chap. 9.1.1. ESRS
Disclosure of the composition and diversity of the members of the administrative, management and supervisory bodies (ESRS 2.21a/c/d/e)	GOV-1	Chap. 3.2 – Governance Model of this report and Paragraphs 11, 17, 21, 31 and 39 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Representation of employees and other workers on the company's administrative, management and supervisory bodies (ESRS 2.21b)	GOV-1	Chap. 3.2 – Governance Model of this report and Paragraphs 11, 17, 21, 31 and 39 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Disclosure of the identity of the administrative, management and supervisory bodies (ESRS 2.22a)	GOV-1	Sections 11, 17, 21, 31 and 39 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Roles and responsibilities of the administrative, management and supervisory bodies in monitoring risks (ESRS 2.22a/b/c)	GOV-1	Chap. 3.3 – Risk management of this report and sections 50 - 51 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
The role of the administrative, management and supervisory bodies with regard to business conduct (ESRS G1.5a)	GOV-1	Chap. 3.2 Governance Model and sections 11- 38 Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company | B. Governing Bodies and Committees | II. Administration and Supervision | III. Supervision
Disclosure of the competences of the members of the administrative, management and supervisory bodies in terms of sustainability and business conduct (ESRS 2.23/ G1.5b)	GOV-1	Chap. 3.2 – Governance Model of this report and in Section 16 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about the IRO (ESRS 2.26a/b/AR6)	GOV-2	Sections 21, 24 and 25 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Incentive schemes and remuneration policies linked to sustainability matters for members of administrative, management and supervisory bodies exist (ESRS 2.29a/b/c/e)	GOV-3	Sections 24 - 25 and 70 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Disclosure of mapping of information provided in sustainability statement about due diligence process	GOV-4	Chap. 9.1.1. ESRS
Description of risk assessment approach followed (ESRS 2.36a/b)	GOV-5	Paragraphs 50-55 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company
Description of main risks identified and their mitigation strategies (ESRS 2.36c)	GOV-5	Chap. 3.3 – Risk management of this report and section 53 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company and section of this chapter referring to the review of the dual materiality analysis
Description of significant groups of products and (or) services offered (ESRS 2.40a-i/ii)	SBM-1	Chap.2.2 Company Profile, Chap. 3.1- Business strategy, Chap. 4 - Business performance
Number of employees (headcount) (ESRS 2.40a-iii)	SBM-1	Chap. 5.3.1.3.2 | Characteristics of salaried employees of the company (S1-6)
Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders (ESRS 2.40e)	SBM-1	Chap.2.2 Company Profile, Chap. 2.3 Sustainable value creation; Chap. 3.1- Business strategy, Chap. 3.4.4 2030 Roadmap; Chap. 3.4.5 Involvement with Stakeholders
Assessment of current significant products and/or services and significant markets and customer groups in relation to their sustainability-related objectives (ESRS 2.40f)	SBM-1	Chap. 4 Business performance
Disclosure of elements of strategy that relate to or impact sustainability matters (ESRS 2.40g)	SBM-1	Chap. 3.1- Business strategy, Chap. 3.4 2030 Agenda and Roadmap, including sub-chapters 3.4.1 – Global Trends and challenges for Navigator, 3.4.2 – 2030 Agenda and 3.4.3 – Contribution to the SDGs
Exemption from disclosure of the information referred to in Article 18(1)(a) of Directive 2013/34/EU (ESRS 2.41)	SBM-1	Note 2.1 relating to the business segments of the Financial Statements
Business model (ESRS 2.42 a/b)	SBM-1	Chap.2.2 Company Profile, Chap. 3.1- Business strategy
Description of stakeholder engagement (ESRS 2, §45a/b)	SBM-2	Chap. 3.4.5 Stakeholder engagement
Description of material impacts resulting from materiality assessment (ESRS2.48a)	SBM-3	Chap. 5.2.2.1.1 Chap. 5.2.3.1.1
Description of material risks and opportunities resulting from materiality assessment (ESRS2.48a)	SBM-3	Chap. 5.2.4.1.1 Chap. 5.2.5.1.1
Disclosure of reasonably expected time horizons of material impacts (ESRS 2.48ciii)	SBM-3	Chap. 5.2.6.1.1 Chap. 5.3.1.1.1 Chap. 5.3.2.1.1

ESRS 2 BP-2 - List of disclosure requirements/*data points* incorporated by reference

Disclosure requirements	ID	Location
Disclosure of specification of impacts, risks and opportunities that are covered by ESRS (ESRS 2.48h)	SBM-3	Chap. 5.3.3.1.1 Chap. 5.4.1.1.1
Climate resilience analysis (ESRS 2.48f)	SBM-3	Chap. 5.2.2.1.1
Disclosure of list of requirements complied with in preparing sustainability statement following outcome of materiality assessment (IRO-2)	IRO-2	Chap. 9.1.1. ESRS
Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statement	IRO-2	Chap. 9.1.1. ESRS
Minimum Application Requirements for Policies - General presentation of policies (MDR-P, ESRS 2.65 a/b/c/d/f)	MDR-P	*
Explanation of relationship of significant CapEx and OpEx required to implement actions taken or planned to relevant line items or notes in financial statements (ESRS 2.69b)	E1-3	Notes 3.2, 3.3 and 3.6 of the Financial Statements
Disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amount (E1.55)	E1-6	Note 2.1 to the Financial Statements
Explanation of how the current financial resources allocated to actions or action plans relate to the most relevant amounts presented in the financial statements (ESRS 2.69b)	E3-2	Notes 3.2, 3.3 and 3.6 of the Financial Statements
Explanation of how time horizons are defined, financial amounts are estimated and critical assumptions made (water and marine resources) (E3.33a, E3.33b, E3.33c)	E3-5	Chap. 5.2.2.1.1 | Results of the Resilience and Impact Analysis of Climate Scenarios
CapEx Information (ESRS 2.69a)	E4-3	Notes 3.2, 3.3 and 3.6 of the Financial Statements
Target 'Contribute to reducing fires in rural areas, ensuring that the area burnt under Navigator's management is less than 1% per year', which falls under prevention in the mitigation hierarchy (MDR-T, ESRS 2, §80)	E4-4	Chap. 5.2.6.3.1
Performance achieved in 2024 in relation to Navigator's commitments under the act4nature Portugal initiative (MDR-T, ESRS 2, §80j)	E4-4	Chap. 9.3
Explanation of how the current financial resources allocated to actions or action plans relate to the most relevant amounts presented in the financial statements (ESRS 2.69b)	E5-2	Notes 3.2, 3.3 and 3.6 of the Financial Statements
Information on following up and monitoring of issues raised and addressed, and ensuring the effectiveness of the Reporting Channel (S1.32e)	S1-3	Chap. 5.4.1.2.1
Information on the relationship between current financial resources allocated to actions or action plans and the most significant amounts presented in the financial statements (ESRS 2.69b)	S1-4	Notes 2.3, 3.2, 3.3 and 3.6 of the Financial Statements
Total number of employees (S1.50f)	S1-6	Notes 7 and 7.1 of the Financial Statements
Information on the follow-up and monitoring of issues raised and addressed and ensuring the effectiveness of the Whistleblowing Channel (S2.27e)	S2-3	Chap. 5.4.1.2.1
Information on the relationship between current financial resources allocated to actions or action plans and the most relevant amounts presented in the financial statements (ESRS 2.69b)	S2-4	Consolidated income statement of the Annual Report
Information on the targets for reducing frequency indexes (Iberia and Mozambique) and the percentage of accidents uncharacterised by non-compliance with rules and procedures (MDR-T, ESRS 2, §80)	S2-5	Chap. 5.3.1.3.1
Information on the implemented actions of the CRESCER project (Grow) and participation in the Business & Human Rights Accelerator Programme (MDR-A, ESRS 2, §68 b/c/e, §69 b/c)	G1.MDR-A	Chap. 5.3.1.2.4
Information on the actions implemented in terms of supplier management (MDR-A, ESRS 2, §68 b/c/e, §69 b/c)	G1.MDR-A	Chap. 5.3.2.2.4
Information on the target for continuous monitoring of employees' main motivational stimuli (MDR-T, ESRS 2, §80)	G1.MDR-T	Chap. 5.3.1.3.1

(*) Given that Navigator has several corporate policies mentioned several times throughout the chapters, to avoid repetition, cross-references have been provided via: summary tables which, where applicable, include a section entitled 'References throughout the non-financial report'; and text at the end of the policies section. Due to their large number, they are not presented in this table.

ESRS 2 GOV-4 – Statement on Due diligence

Core elements of Due Diligence	Points in the Non-Financial Statement	Location
Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2	Chap. 5.1.2.2
	ESRS 2 GOV-3	Chap. 5.1.2.3
	ESRS 2 SBM-3	Chap. 5.1.3.3 Chap. 5.2.2.1.1 Chap. 5.2.3.1.1 Chap. 5.2.4.1.1 Chap. 5.2.5.1.1 Chap. 5.2.6.1.1 Chap. 5.3.1.1.1 Chap. 5.3.2.1.1 Chap. 5.3.3.1.1 Chap. 5.4.1.1.1
Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 GOV-2	Chap. 5.1.2.2
	ESRS 2 SBM-2	Chap. 5.1.3.2
	ESRS 2 IRO-1	Chap. 5.1.4.1
	ESRS 2 MDR-P	Chap. 5.2.2.2.1 Chap. 5.2.3.2.1 Chap. 5.2.4.2.1 Chap. 5.2.5.2.1 Chap. 5.2.6.2.1 Chap. 5.3.1.2.1 Chap. 5.3.2.2.1 Chap. 5.3.3.2.1 Chap. 5.4.1.2.1 Chap. 5.4.1.2.2 Chap. 5.4.1.2.3
Identifying and assessing adverse impacts	ESRS 2 IRO-1	Chap. 5.1.4.1
	ESRS 2 SBM-3	Chap. 5.1.3.3 Chap. 5.2.2.1.1 Chap. 5.2.3.1.1 Chap. 5.2.4.1.1 Chap. 5.2.5.1.1 Chap. 5.2.6.1.1 Chap. 5.3.1.1.1 Chap. 5.3.2.1.1 Chap. 5.3.3.1.1 Chap. 5.4.1.1.1
Taking actions to address those adverse impacts	ESRS 2 MDR-A	Chap. 5.2.2.2.2 Chap. 5.2.3.2.2 Chap. 5.2.4.2.2 Chap. 5.2.5.2.2 Chap. 5.2.6.2.2 Chap. 5.3.1.2.4 Chap. 5.3.2.2.4 Chap. 5.3.3.2.4 Chap. 5.4.1.2.4
Tracking the effectiveness of these efforts and communicating	ESRS 2 MDR-M	Chap. 5.2.2.3.1 Chap. 5.2.3.3.1 Chap. 5.2.3.3.2 Chap. 5.2.4.3.1

ESRS 2 GOV-4 – Statement on Due diligence

Core elements of Due Diligence	Points in the Non-Financial Statement	Location
		Chap. 5.2.4.3.2 Chap. 5.2.5.3.1 Chap. 5.2.5.3.2 Chap. 5.2.5.3.3 Chap. 5.2.6.3.2 Chap. 5.3.1.3.1 Chap. 5.3.1.3.12 Chap. 5.3.2.3.1 Chap. 5.3.3.3.1 Chap. 5.4.1.3.3
	ESRS 2 MDR-T	Chap. 5.2.2.3.1 Chap. 5.2.3.3.1 Chap. 5.2.4.3.1 Chap. 5.2.5.3.1 Chap. 5.2.6.3.1 Chap. 5.3.1.3.1 Chap. 5.3.2.3.1 Chap. 5.3.3.3.1 Chap. 5.4.1.3.1

9.1.2. DNFI table (Disclosure of Non-financial Information)

This table establishes the correlation between the contents of Navigator's 2025 Management Report and the elements required in the report template for the disclosure of non-financial information, recommended by CMVM (The Portuguese Securities Market Commission). This model, applicable to companies issuing listed securities on a regulated market, is based on the relevant legal framework.

A. Information on the Policies adopted

Chapters	Subchapters	ESRS	Location
A. INTRODUCTION	1. Description of the Company's general policy regarding sustainability issues, indicating any changes to previously approved policy.	SBM-1	Chap. 3.1 Chap. 3.4 Chap. 5.1.3.1
	2. Description of the methodology and reasons for its use in non-financial information reporting, and any changes that have occurred in relation to previous years and the reasons behind them.	BP-1 BP-2	Chap. 5.1.1
B - BUSINESS MODEL	1. General description of the business model and type of organisation of the Company/Group, stating the main businesses and markets the company operates in (if possible, using organisation charts, graphs or functional diagrams).	SBM-1	Chap. 2.2 Chap. 5.1.3.1
C. MAIN RISK FACTORS	1. Identification of the main risks related to the topics under report and arising from the Company's activities, products, services or business relations, including, if applicable and whenever possible, supply and subcontracting chains.	SBM-3	Chap. 3.3 Chap. 5.1.2.1 Chap. 5.1.2.4 Chap. 5.1.3.3 Chap. 5.2.2.1.1
	2. Indication of how these risks are identified and managed by the Company.	GOV-1 GOV-5 SBM-3 IRO-1	Chap. 5.2.3.1.1 Chap. 5.2.4.1.1 Chap. 5.2.5.1.1 Chap. 5.2.6.1.1 Chap. 5.3.1.1.1
	3. Explanation of the internal functional division of competences, including the governing bodies, commissions, committees or departments responsible for the identification and management/monitoring of risks.	GOV-1	Chap. 5.3.2.1.1 Chap. 5.3.3.1.1 Chap. 5.4.1.1.1
	4. Clear statement of the new risks identified by the Company in relation to those reported in previous years, and risks that are no longer there.	SBM-3	
	5. Indication and brief description of the main opportunities identified by the Company in the context of the topics under report.	SBM-3	
D. POLICIES IN PLACE			
I. ENVIRONMENTAL POLICIES	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them.	E1-1 E1-2 E1-3 E1-4 E2-1 E2-2	Chap. 3.4.2 Chap. 3.4.3 Chap. 3.4.4 Chap. 5.2.2.1.2 Chap. 5.2.2.2.1 Chap. 5.2.2.2.2 Chap. 5.2.2.3.1 Non-material Non-material

Chapters	Subchapters	ESRS	Location
		E2-3	Non-material
		E3-1	Chap. 5.2.3.2.1
		E3-2	Chap. 5.2.3.2.2
		E3-3	Chap. 5.2.3.3.1
		E4-1	Chap. 5.2.4.1.2
		E4-2	Chap. 5.2.4.2.1
		E4-3	Chap. 5.2.4.2.2
		E4-4	Chap. 5.2.4.3.1
		E5-1	Chap. 5.2.5.2.1
		E5-2	Chap. 5.2.5.2.2
		E5-3	Chap. 5.2.5.3.1
		MDR-P *(entity specific)*	Chap. 5.2.6.2.1
		MDR-A *(entity specific)*	Chap. 5.2.6.2.2
		MDR-T *(entity specific)*	Chap. 5.2.6.3.1
	2. Description of the defined key performance indicators.		Chap. 3.4.4 Chap. 8.2
		E1-4	Chap. 5.2.2.3.1
		E1-5	Chap. 5.2.2.3.2
		E1-6	Chap. 5.2.2.3.3
		E2-3	Non-material
		E2-4	Non-material
		E2-5	Non-material
		E3-3	Chap. 5.2.3.3.1
		E3-4	Chap. 5.2.3.3.2
		E4-4	Chap. 5.2.4.3.1
		E4-5	Chap. 5.2.4.3.2
		E5-3	Chap. 5.2.5.3.1
		E5-4	Chap. 5.2.5.3.2
		E5-5	Chap. 5.2.5.3.3
		MDR-T *(entity specific)*	Chap. 5.2.6.3.1
		MDR-M *(entity specific)*	Chap. 5.2.6.3.2
	3. Indication, compared to the previous year, of the level of achievement of those objectives, at least by reference to:		Chap. 3.4.4
	I. Sustainable use of resources	E3-3	Chap. 5.2.3.3.1
		E5-3	Chap. 5.2.5.3.1
		MDR-T *(entity specific)*	Chap. 5.2.6.3.1
	ii. Pollution and climate change	E1-4	Chap. 5.2.2.3.1
		E2-3	Non-material
			Chap. 8.2
	iii. Circular economy and waste management	E5-3	Chap. 5.2.5.3.1
	iv. Biodiversity protection	E4-4	Chap. 5.2.4.3.1
II. SOCIAL AND FISCAL POLICIES	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them		Chap. 3.4.2 Chap. 3.4.3 Chap. 3.4.4 Chap. 4.10
		S2-1	Chap. 5.3.2.2.1
		S2-4	Chap. 5.3.2.2.4
		S2-5	Chap. 5.3.2.3.1
		S3-1	Chap. 5.3.3.2.1
		S3-4	Chap. 5.3.3.2.4
		S3-5	Chap. 5.3.3.3.1
		S4-1	Non-material
		S4-4	Non-material
		S4-5	Non-material

Chapters	Subchapters	ESRS	Location
		G1-2	Chap. 5.4.1.2.2
	2. Description of the defined key performance indicators		Chap. 3.4.4
		MDR-M (S2)	Chap. 5.3.2.3.2
		MDR-M (S3)	Chap. 5.3.3.3.2
		MDR-M (S4)	Non-material
		MDR-M (G1)	Chap. 5.4.1.3.3
	3. Indication, compared to the previous year, of the level of achievement of those objectives, at least by reference to:		Chap. 3.4.4
	i. Company's commitment to the community	S3-5	Chap. 5.3.3.3.1
	ii. Subcontracting and Suppliers	S2-5	Chap. 5.3.2.3.1
		MDR-T (G1)	5.4.1.3.1
	iii. Consumers	S4-5	Non-material
	iv. Responsible investment	Not Applicable	Chap. 2.3
	v. Stakeholders		Chap. 3.4.5
		SBM-2	Chap. 5.1.3.2
		S1-2	Chap. 5.3.1.2.2
		S2-2	Chap. 5.3.2.2.2
		S3-2	Chap. 5.3.3.2.2
		S4-2	Non-material
	vi. Tax Information	Not Applicable	Chap. 4.10
III. WORKERS AND GENDER EQUALITY AND NON-DISCRIMINATION	1. Description of the Company's strategic objectives and the main actions to be taken to achieve them		Chap. 3.4.2
			Chap. 3.4.3
			Chap. 3.4.4
		S1-1	Chap. 5.3.1.2.1
		S1-4	Chap. 5.3.1.2.4
		S1-5	Chap. 5.3.1.3.1
	2. Description of the defined key performance indicators		Chap. 3.4.4
			Chap. 8.2
		S1-5	Chap. 5.3.1.3.1
		S1-6	Chap. 5.3.1.3.2
		S1-7	Chap. 5.3.1.3.3
		S1-8	Chap. 5.3.1.3.4
		S1-9	Chap. 5.3.1.3.5
		S1-10	Chap. 5.3.1.3.6
		S1-11	Non-material
		S1-12	Non-material
		S1-13	Chap. 5.3.1.3.7
		S1-14	Chap. 5.3.1.3.8
		S1-15	Chap. 5.3.1.3.9
		S1-16	Chap. 5.3.1.3.10
		S1-17	Chap. 5.3.1.3.11
		MDR-M (S1)	Chap. 5.3.1.3.12
	3. Indication, compared to the previous year, of the level of achievement of those objectives, at least by reference to:		Chap. 3.4.4
	I. Employment	S1-5	Chap. 5.3.1.3.1
	II. Work organisation	S1-5	Chap. 5.3.1.3.1
	III. Health and safety	S1-5	Chap. 5.3.1.3.1
	IV. Social relationships	S1-5	Chap. 5.3.1.3.1
	V. Training	S1-5	Chap. 5.3.1.3.1
	VI. Social equality	S1-5	Chap. 5.3.1.3.1
IV. HUMAN RIGHTS	1. Description of the Company's strategic objectives		Chap. 3.4.2
	1. Description of the Company´s strategic objectives and the main actions to be taken to achieve them		Chap. 3.4.3
			Chap. 3.4.4
		S1-1	Chap. 5.3.1.2.1
		S1-4	Chap. 5.3.1.2.4

Chapters	Subchapters	ESRS	Location
		S1-5	Chap. 5.3.1.3.1
		S2-1	Chap. 5.3.2.2.1
		S2-4	Chap. 5.3.2.2.4
		S2-5	Chap. 5.3.2.3.1
		S3-1	Chap. 5.3.3.2.1
		S3-4	Chap. 5.3.3.2.4
		S3-5	Chap. 5.3.3.3.1
		S4-1	Non-material
		S4-4	Non-material
		S4-5	Non-material
		G1-1	Chap. 5.4.1.2.1
		MDR-A (G1)	Chap. 5.4.1.2.4
		MDR-T (G1)	Chap. 5.4.1.3.1
	2. Description of the defined key performance indicators	S1-5	Chap. 5.3.1.3.1
		S1-17	Chap. 5.3.1.3.11
		S2-5	Chap. 5.3.2.3.1
		MDR-M (S2)	Chap. 5.3.2.3.1
		S3-5	Chap. 5.3.3.3.1
		MDR-M (S3)	Chap. 5.3.3.3.2
		S4-5	Non-material
		MDR-M (S4)	Non-material
	3. Indication, compared to the previous year, of the level of achievement of those objectives, at least by reference to: i. Due diligence procedures ii. Risk prevention measures iii. Legal proceedings	GOV-4	Chap. 9.1.1
		S1-5	Chap. 5.3.1.3.1
		S1-17	Chap. 5.3.1.3.11
		S2-5	Chap. 5.3.2.3.1
		S3-5	Chap. 5.3.3.3.1
		S4-5	Non-material
		G1-2	Chap. 9.1.1
		MDR-T (G1)	Chap. 5.4.1.3.1
V. ANTI-CORRUPTION AND ANTI-BRIBERY	1. Prevention of corruption: measures and instruments used to prevent corruption and bribery; policies implemented to deter such practices among employees and Suppliers; information on the compliance system and indication as to the respective functional managers, if any; indication of legal proceedings involving the Company, its managers or employees related to corruption or bribery; measures adopted in public procurement, if relevant	G1-1	Chap. 5.4.1.2.1
		G1-3	Chap. 5.4.1.2.3
		G1-4	Chap. 5.4.1.3.2
		MDR-A (G1)	Chap. 5.4.1.2.4 Corporate Governance Report
	2. Prevention of money laundering (for issuers under this regime): anti-money laundering measures; indication of the number of cases reported annually.	G1-1	Chap. 5.4.1.2.1 Corporate Governance Report
	3. Codes of ethics: indication of any code of ethics the Company is bound to or is implemented; stating the respective mechanisms for implementing and monitoring compliance with it, if applicable.	G1-1	Chap. 5.4.1.2.1 Corporate Governance Report
	4. Conflict of interest management: management measures and monitoring of conflicts of interest, namely the requirement to sign declarations of interest, conflicts and impediments by managers and employees.	G1-1	Chap. 5.4.1.2.1 Corporate Governance Report

B. Disclosures on standards followed

1. IDENTIFICATION OF STANDARDS FOLLOWED IN NON-FINANCIAL INFORMATION REPORTING	Identification of the standards/guidelines followed in the preparation of non-financial information, including the respective options, as well as other principles duly considered in the Company's performance, if applicable. When referring to the UN Sustainable Development Goals (SDG) 2030 Agenda, state the goals and targets the Company undertakes to meet, stating the measures taken, each year, to pursue the purposes outlined in relation to each of these SDG. In other words, identify concrete actions, projects or investments aimed at meeting these SDG.	BP-1 BP-2	Chap. 3.4.3 Chap. 5.1.1.1 Chap. 5.1.1.2
2. IDENTIFICATION OF THE SCOPE AND METHODOLOGY OF INDICATORS CALCULATION	Description of the scope and calculation methodology (including the calculation formula) of the indicators presented, as well as the limitations of such reporting. Whenever possible, design of a correlation table between the indicators presented and the principles or objectives considered, indicating the site where the information is detailed (e.g., the page of the stand-alone non-financial information report, the annual report, another document or the Company's website).	BP-2 E1-5 E1-6 E2-4 E2-5 E3-4 E4-5 E5-4 E5-5 MDR-M (*entity specific*) S1-6 S1-7 S1-8 S1-9 S1-10 S1-11 S1-12 S1-13 S1-14 S1-15 S1-16 S1-17 MDR-M (S1) MDR-M (S2) MDR-M (S3) MDR-M (S4) G1-3 G1-4 MDR-M (G1)	Chap. 8 Chap. 5.1.1.2 Chap. 5.2.2.3.2 Chap. 5.2.2.3.3 Non-material Non-material Chap. 5.2.3.3.2 Chap. 5.2.4.3.2 Chap. 5.2.5.3.2 Chap. 5.2.5.3.3 Chap. 5.2.6.3.2 Chap. 5.3.1.3.2 Chap. 5.3.1.3.3 Chap. 5.3.1.3.4 Chap. 5.3.1.3.5 Chap. 5.3.1.3.6 Non-material Non-material Chap. 5.3.1.3.7 Chap. 5.3.1.3.8 Chap. 5.3.1.3.9 Chap. 5.3.1.3.10 Chap. 5.3.1.3.11 Chap. 5.3.1.3.12 Chap. 5.3.2.3.2 Chap. 5.3.3.3.2 Non-material Chap. 5.4.1.2.3 Chap. 5.4.1.3.2 Chap. 5.4.1.3.3
3. EXPLANATION IN CASE NON-APPLICATION OF POLICIES	f the Company does not apply policies with respect to one or more issues, the non-financial reporting provides an explanation of the reasons for this.	--	--
4. FURTHER INFORMATION	Additional elements or information which, whilst not covered in the previous points, are relevant to understanding, context and justify the relevance of the non-financial information disclosed, namely regarding networks/consortia of entities linked to sustainability and corporate responsibility issues within the organisations of which it is a member or to which it belongs, whether at national or international level, and sustainability commitments that the Company has voluntarily undertaken, whether at local or global level.	--	--

9.1.3. Summary table of metrics of the World Economics Forum's Stakeholder Capitalism

The following table presents The Navigator Company's response to the WEF framework (core metrics), through the alignment between the metrics established by the WEF, the GRI standards (underlying the creation of the new framework) and the ESRS Standards.

Although some of these metrics do not correspond to the GRI, the Company addresses them indirectly through content related to the relevant topics presented throughout the sustainability report.

Pillar	Topic	Metrics	Alignment with GRI	Alignment with ESRS
Governance	Purpose of Governance	Purpose established	GRI 2-12	GOV-1 SBM-1
	Quality of Governance Body	Composition of the *Governance* Body	GRI 2-9 GRI 405-1	GOV-1
	Stakeholder Engagement	Stakeholder Engagement	GRI 2-12 GRI 2-29 GRI 3-2	SBM-2/3 IRO-1
	Ethical behaviour	Anti-corruption	GRI 205-2 GRI 205-3	G1-1 G1-3 G1-4
	Ethical behaviour	Advisory mechanisms	GRI 2-26	S1-3 S2-3 S3-3 S4-3[1] G1-1
	Risks and Opportunities	Integration of Risks and Opportunities	No associated GRI	SBM-3 IRO-1
Planet	Climate Change	Greenhouse gas emissions (GHG)	GRI 305-1/2/3	E1-6
		Implementation of the recommendations of the TCFD - Task Force on Climate-related Financial Disclosures	No associated GRI	GOV-1/2/3 SBM-3 IRO-1 E1-1/2/3/4/6/9
	Biodiversity loss	Land use and ecological protection focused on protected areas or areas of high biodiversity value.	GRI 304-1	E4-5
	Fresh water availability	Water consumption and withdrawl in waterstressed areas	GRI 303-3/5	E3-4
People	Dignity and equity	Diversity and inclusion: % of employees by professional category, gender, age group and other diversity categories	GRI 405-1 and 405-2	S1-9 S1-12[2]
		Wage ratio between men and women, minorities and ethnic majorities, among others		S1-16
		Salary Variation (%) between entry salary and national minimum wage, by gender	GRI 202-1	S1-10
		Salary Variation (%) between the total annual compensation of the CEO and the median total compensation of the remaining employees, except the CEO	GRI 2-21	S1-16
		Risk of child, forced or slave labour incidents	GRI 408-1 and 409-1	SBM-3 S1-17
	Health and well-being	Safety and health (%). Number and ratio of occupational accidents, serious accidents and deaths.	GRI 403-9	S1-14
		An explanation of how the organisation facilitates workers' access to non-work-related medical and health services, and the scope of the access offered.	GRI 403-6	S1-4/[S2-43] S1-11[4]
	Training for the future	Training (no.) training hours per employee	GRI 404-1	S1-13

Pillar	Topic	Metrics	Alignment with GRI	Alignment with ESRS
		Training (€) investment in training per employee	No associated GRI	No associated ESRS[5]
Prosperity	Employment and wealth generation	Staff turnover rate (%) between new hires and departures, broken down by age and gender or other diversity indicators.	GRI 401-1	S1-6
		Economic contribution: The direct economic value generated and distributed (EVG&D) by revenue; operating costs, employee salaries and benefits, payments to capital providers, payments to government (per country), and investments in the community.	GRI 201-1	No associated ESRS
		Financial support received from the government: tax benefits and credits; grants; grants for investment, research and development and other relevant types of grants, among others.	GRI 201-4	No associated ESRS
		Investment financial contribution Total capital expenditures or capital goods investment (CapEx) without amortisation, supported by the narrative described by the organisation's investment strategy.	No associated GRI	No associated ESRS[6]
		Share buyback and dividend payment, supported by the narrative to describe the company's strategy for returning capital to shareholders.	No associated GRI	No associated ESRS[7]
	Innovation for better products and services	R&D spending	No associated GRI	No associated ESRS
		Total costs associated with development		
	Community and social vitality	Taxes: The total global tax borne by the company, including corporate income taxes, property taxes, non-creditable VAT and other sales taxes, employer-paid payroll taxes, and other taxes that constitute costs to the company, by tax category.	GRI 201-1 and 207-4	No associated ESRS

9.2. GRI Table

This index lists the GRI Standards and indicators met by Navigator, with cross-references to the relevant sections in the Report (or other external sources) and details of the response provided within the table itself, where applicable.

Statement of use	The Navigator Company reported with reference to the GRI Standards for the period from 1 January 2025 to 31 December 2025
GRI 1 used:	GRI 1: Fundamentals 2021

UNIVERSAL CONTENTS

GRI 2: GENERAL CONTENTS 2021	**ESRS**	**LOCATION**
Regarding the standard published in 2021		
THE ORGANISATION AND ITS REPORTING PRACTICES		
2-1 Organisational profile	--	Chap. 2
2-2 Entities included in the organisation´s sustainability reporting	BP-1	Chap. 5.1.1.1
2-3 Reporting period, frequency and contact points	--	Chap. 5.1.1.1
2-4 Restatements of information	BP-2	Chap. 5.1.1.2
2-5 External verification	--	Chap. 5.1.1.1
ACTIVITIES AND WORKERS		
2-6 Activities, value chains and other business relationships	SBM-1	Chap. 2.2 Chap. 5.1.3.1
2-7 Employees	SBM-1 S1-6	Chap. 5.1.3.1 Chap. 5.3.1.3.2 Chap. 8.3
2-8 Non-employee workers	S1-7	Chap. 5.3.1.3.3
GOVERNANCE		
2-9 Governance and management structure	GOV-1	Chap. 5.1.2.1
2-10 Nominating and selecting the highest governance body	--	Sections 16 and 17, Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Corporate Governance | B. Governing Bodies and Committees | II. Administration and Supervision.
2-11 Chair of the highest governance body	--	Chap. 3.2
2-12 Role of highest governance body in overseeing the management of impacts	GOV-1 GOV-2 SBM-2	Chap. 5.1.2.1 Chap. 5.1.2.2 Chap. 5.1.3.2
2-13 Duty assignment for impact management	GOV-1 GOV-2	Chap. 5.1.2.1 Chap. 5.1.2.2
2-14 Role of the highest ranking governance body in sustainability reporting	GOV-1 IRO-1	Chap. 5.1.2.1 Chap. 5.1.4.1
2-15 Conflicts of interest	--	Section 10, Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company | A. Shareholder Structure | 1.1.2. Equity Interests

		and Bonds held, and sections 89, 90 and 91 in the Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company | E. Related Party Transactions and Conflicts of Interests | I. Procedure and Control Mechanisms
2-16 Communication of crucial concerns	GOV-2 G1-3	Chap. 5.1.2.2 Chap. 5.4.1.2.3
2-17 Collective knowledge of the highest governance body	GOV-1	Chap. 3.2 Chap. 5.1.2.1
2-18 Performance assessment of the highest ranking governance body	--	Sections 24-25, Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company | A. Shareholder Structure | 1.1.2. Equity Interests and Bonds held
2-19 Remuneration policies	GOV-3	Chap. 5.1.2.3 Section 70, Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company D. Compensation | III. Remuneration structure
2-20 Process to determine remuneration	GOV-3	Chap. 5.1.2.3 Sections 66-67, Corporate Governance Report | Part I - Information on Shareholder Structure, Organisation and Governance of the Company | D. Compensation | II. Remuneration Committee
2-21 Annual compensation ratio	S1-16	Chap. 5.3.1.3.10
STRATEGIES, POLICIES AND PRACTICES		
2-22 Statement on the sustainable development strategy	SBM-1	Chap.1.1/1.2 Chap. 3.4 Chap. 5.1.3.1
2-23 Policy-related commitments	GOV-4 E1-2 E3-1 E4-2 E5-1 MDR-P S1-1 S2-1 S3-1 G1-1	Chap. 3.4 Chap. 9.1.1 Chap. 5.2.2.2.1 Chap. 5.2.3.2.1 Chap. 5.2.4.2.1 Chap. 5.2.5.2.1 Chap. 5.2.6.2.1 Chap. 5.3.1.2.1 Chap. 5.3.2.2.1 Chap. 5.3.3.2.1 Chap. 5.4.1.2.1

2-24 Incorporation of commitments	GOV-2 E1-3 E3-2 E4-3 E5-2 MDR-A S1-4 S2-4 S3-4 G1-1	Chap. 5.1.2.2 Chap. 5.2.2.3.1 Chap. 5.2.3.2.2 Chap. 5.2.4.2.2 Chap. 5.2.5.2.2 Chap. 5.2.6.2.2 Chap. 5.3.1.2.4 Chap. 5.3.2.2.4 Chap. 5.3.3.2.4 Chap. 5.4.1.2.1
2-25 - Processes to remediate negative impacts	S1-3 S2-3 S3-3	Chap. 5.3.1.2.3 Chap. 5.3.2.2.3 Chap. 5.3.3.2.3
2-26 Mechanisms for seeking advice and raising issues	S1-3 S2-3 S3-3 G1-1	Chap. 5.3.1.2.3 Chap. 5.3.2.2.3 Chap. 5.3.3.2.3 Chap. 5.4.1.2.1
STAKEHOLDER ENGAGEMENT		
2-29 Approach to stakeholder engagement	SBM-2 S1-2 S2-2 S3-2	Chap. 3.4.5 Chap. 5.1.3.2 Chap. 5.3.1.2.2 Chap. 5.3.2.2.2 Chap. 5.3.3.2.2
2-30 Collective bargaining agreements	S1-8	Chap. 5.3.1.3.4

GRI 3: MATERIAL TOPICS	**ESRS**	**LOCATION**
Regarding the standard published in 2021		
3-1 Materiality definition process	IRO-1	Chap. 5.1.4.1
3-2 List of material topics	SBM-3	Chap. 5.1.3.3 Chap. 5.2.2.1.1 Chap. 5.2.3.1.1 Chap. 5.2.4.1.1 Chap. 5.2.5.1.1 Chap. 5.2.6.1.1 Chap. 5.3.1.1.1 Chap. 5.3.2.1.1 Chap. 5.3.3.1.1 Chap. 5.4.1.1.1
3-3 Management of material topics	SBM-3 T1 T3 E4 E5 MDR-P/A/T/M S1 S2 S3 G1	Chap. 3.4 Chap. 5.1.3.3 Chap. 5.2.2 Chap. 5.2.3 Chap. 5.2.4 Chap. 5.2.5 Chap. 5.2.6 Chap. 5.3.1 Chap. 5.3.2 Chap. 5.3.3 Chap. 5.4.1

SPECIFIC CONTENT	**ESRS**	**LOCATION**
GRI 101: BIODIVERSITY		
Regarding the standard published in 2024		
101-1 Policies to halt and reverse biodiversity loss	E4-2 MDR-P	Cap. 5.2.4.2.1
101-2 Biodiversity impact management	E4-3	Cap 5.5.4.2.2
101-4 Identification of impacts on biodiversity	SBM-3 (E4)	Cao 5.2.4.1.1
101-5 Sites with an impact on biodiversity	E4-5	Cap. 5.2.4.3.2

101-6 Direct causes of biodiversity loss	MDR-M E4-5 MDR-M	Cap. 5.2.4.3.2
101-7 Alterations to the state of biodiversity	E4-5 MDR-M	Cap. 5.2.4.3.2

GRI 200: ECONOMIC PERFORMANCE		
GRI 201: ECONOMIC PERFORMANCE	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
201-1 Direct economic value generated and distributed	--	Chap. 2.3 Chap. 8.1
201-2 Financial implications, risks and opportunities due to climate change	SBM-3 SBM-3 (E1) E1-9	Chap. 5.1.3.3 Chap. 5.2.2.1.1 Chap. 5.2.2.3.4
201-3 Obligations with defined benefit plans and other retirement plans	--	Consolidated Financial Statements 2023 | 7. Staff – 7.2 Employee benefits
201-4 Financial support received from the Government	--	Chap. 8.1

GRI 202: MARKET PRESENCE	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
202-1 Ratio of lowest wage by gender compared to local minimum wage	S1-10	Chap. 5.3.1.3.6

GRI 203: INDIRECT ECONOMIC IMPACTS	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
203-1 Investment in infrastructure and insured services	--	Chap. 5.2.6.2.2 Chap. 5.2.6.3.2 Chap. 5.3.3.2.4 Chap. 5.3.3.3.2
Significant indirect economic impacts	--	Chap. 2.3

GRI 204: PURCHASING/SOURCING PRACTICES	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
204-1 Proportion of expenses with local suppliers	--	Chap. 5.4.1.3.3 Chap. 8.1

GRI 205: ANTI-CORRUPTION	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
205-2 Communication and training in anti-corruption policies and procedures	G1-3	Chap. 5.4.1.2.3
205-3 Confirmed corruption incidents and actions taken	G1-4	Chap. 5.4.1.3.2

GRI 207: TAXATION	**ESRS**	**LOCATION**
Regarding the standard published in 2019		
207-1 Tax approach	--	Chap. 4.9
207-2 Governance, control and risk management	--	Chap. 4.9
207-3 Stakeholder engagement and management of issues related to taxation	--	Chap. 4.9
207-4 Reporting per country	--	Chap. 4.9 Chap. 4.10

GRI 300: ENVIRONMENTAL PERFORMANCE		
GRI 301: MATERIALS	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
301-1 Total consumption of materials used by weight or volume		Chap. 8.2

	E5-4	Chap. 5.2.5.3.2
301-2 Use of recycled materials	E5-4	Chap. 8.2 Chap. 5.2.5.3.2

GRI 302: ENERGY	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
302-1 Energy consumption within the organisation	E1-5	Chap. 8.2 Chap. 5.2.2.3.2
302-3 Energy intensity	E1-5	Chap. 8.2 Chap. 5.2.2.3.2
302-4 Reduction of energy consumption	--	Chap. 8.2

GRI 303: WATER AND EFFLUENTS	**ESRS**	**LOCATION**
Regarding the standard published in 2018		
303-1 Interactions with water as a shared resource	SBM-3 (E3) E3-1 E3-2 E3-3	Chap. 5.2.3.1.1 Chap. 5.2.3.2.1 Chap. 5.2.3.2.2 Chap. 5.2.3.3.1
303-3 Water Withdrawal	E3-4	Chap. 5.2.3.3.2 Chap. 8.2
303-4 Effluents	E3-4	Chap. 5.2.3.3.2
303-5 Water Consumption	E3-4	Chap. 5.2.3.3.2

GRI 305: EMISSIONS 2016	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
305-1 Direct GHG emissions (Scope 1)	E1-6	Chap. 5.2.2.3.3 Chap. 8.2
305-2 Indirect energy GHG emissions (Scope 2)	E1-6	Chap. 5.2.2.3.3 Chap. 8.2
305-3 Other indirect GHG emissions (Scope 3)	E1-6	Chap. 5.2.2.3.3 Chap. 8.2
305-4 GHG emission intensity	E1-6	Chap. 5.2.2.3.3 Chap. 8.2
305-5 Reduction of GHG emissions	E1-7	Chap. 8.2 --
305-7 Emissions of nitrogen oxides (NO_x), sulphur oxides (SO_x) and other significant air emissions	E2-4	Chap. 8.2 --

GRI 306: WASTE	**ESRS**	**LOCATION**
Regarding the standard published in 2020		
306-1 Generation of waste and related impacts	SBM-3 (E5) E5-4	Chap. 5.2.5.1.1 Chap. 5.2.5.3.2
306-2 Impacts management	E5-2 E5-5	Chap. 5.2.5.2.2 Chap. 5.2.5.3.3
306-3 Waste generated	E5-5	Chap. 5.2.5.3.3 Chap. 8.2
306-4 Waste not intended for final disposal	E5-5	Chap. 5.2.5.3.3 Chap. 8.2
306-5 Waste not intended for final disposal	E5-5	Chap. 5.2.5.3.3 Chap. 8.2

GRI 308: ENVIRONMENTAL ASSESSMENT OF SUPPLIERS	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
308-1 New suppliers selected based on environmental criteria	G1-2	Chap. 5.4.1.2.2

308-2 Negative environmental impacts in the supply chain and actions taken	SBM-3 (G1) MDR-A	Chap. 5.4.1.1.1 Chap. 5.4.1.2.4

GRI 400: SOCIAL PERFORMANCE		
GRI 401: EMPLOYMENT	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
401-1 Hiring new Employees and Employee turnover	S1-6	Chap. 5.3.1.3.2
401-3 Parental leave	S1-15	Chap. 5.3.1.3.9

GRI 403: OCCUPATIONAL HEALTH AND SAFETY	**ESRS**	**LOCATION**
Regarding the standard published in 2018		
403-1 Occupational Health and Safety management system	S1-1	Chap. 5.3.1.2.1
403-2 Hazard identification, risk assessment and incident investigation	S1-3	Chap. 5.3.1.2.3
403-3 Occupational Health Services	S1-4	Chap. 5.3.1.2.4
403-4 Participation, consultation and communication to Employees on Occupational Safety and Health	S1-2	Chap. 5.3.1.2.2
403-5 Training of workers in Occupational Health and Safety	S1-4	Chap. 5.3.1.2.4
403-6 Promotion of Employee Health	S1-4	Chap. 5.3.1.2.4
403-7 Prevention and mitigation of occupational safety and health impacts directly related to business relationships	S2-4	Chap. 5.3.2.2.4
403-8 Workers covered by an occupational safety and health management system	S1-14	Chap. 5.3.1.3.8
403-9 Occupational accidents	S1-14	Chap. 5.3.1.3.8 Chap. 8.3
403-10 Occupational diseases	S1-14	Chap. 5.3.1.3.8

GRI 404: EDUCATION AND TRAINING	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
404-1 Average annual training hours per Employee	S1-13	Chap. 5.3.1.3.7
404-2 Programs for skills development and end-of-career management	S1-1 S1-5	Chap. 5.3.1.2.1 Chap. 5.3.1.3.1
404-3 Percentage of Employees who regularly receive performance reviews and career development	S1-13	Chap. 5.3.1.3.7

GRI 405 - DIVERSITY AND EQUAL OPPORTUNITIES	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
405-1 Diversity in governance bodies and employees	GOV-1 S1-6 S1-9	Chap. 5.1.2.1 Chap. 5.3.1.3.2 Chap. 5.3.1.3.5
405-2 Ratio of base wage and remuneration between men and women	S1-16	Chap. 5.3.1.3.10

GRI 406: DISCRIMINATION	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
406-1 Discriminatory incidents and corrective actions taken	S1-17	Chap. 5.3.1.3.11

GRI 408: CHILD LABOUR	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
408-1 Operations and suppliers at significant risk of child labour incidents	S1-1 S2-1	Chap. 5.3.1.2.1 Chap. 5.3.2.2.1

GRI 409: FORCED OR SLAVE LABOUR	**ESRS**	**LOCATION**

Regarding the standard published in 2016		
409-1 Operations and suppliers at significant risk of slave or forced labour incidents	S1-1 S2-1	Chap. 5.3.1.2.1 Chap. 5.3.2.2.1

GRI 413: LOCAL COMMUNITIES	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
413-1 Operations with local community involvement, impact assessments and development programmes	S3-2 S3-3 S3-4	Chap. 5.3.3.2.2 Chap. 5.3.3.2.3 Chap. 5.3.3.2.4

GRI 414: SOCIAL ASSESSMENT OF SUPPLIERS	**ESRS**	**LOCATION**
Regarding the standard published in 2016		
414-1 New suppliers selected based on social criteria	G1-2	Chap. 5.4.1.2.2
414-2 Negative social impacts on the supply chain and actions taken	SBM-3 (S2) S2-4 SBM-3 (G1) MDR-A	Chap. 5.3.2.1.1 Chap. 5.3.2.2.4 Chap. 5.4.1.1.1 Chap. 5.4.1.2.4

9.3. Progress Report on Meeting Act4nature Portugal Commitments

INDIVIDUAL COMMITMENT 1 | Finalise the approach to integrating B&SE conservation in the corporate strategy, in line with available scientific knowledge and voluntary commitments until Dec. 2024.

2025 | Update of the approved biodiversity conservation strategy.

INDIVIDUAL COMMITMENT 2 | Materialise the annual plans for monitoring species and habitats and develop maintenance, improve conservation and restore B&SE status in forests managed by the Company, in the following aspects: (i) conservation, (ii) re-qualification and (iii) ecological restoration. In terms of ecological restoration, start and/or maintain actions on at least 110 hectares by 2030 Continue the remaining maintenance activities and conservation status improvements (actions in at least 30 ha/year) until 2030; carry out at least one recovery project for one endangered species and support another until 2030.

2025 | Monitoring of annual plans and specific projects

Overall cumulative global results of the annual monitoring plans on the forest heritage managed by the Company using experts:

23 properties from North to South of mainland Portugal were monitored (flora, fauna and vegetation) by specialists, and 4 nesting sites of endangered species were also monitored. In mainland Portugal, in the properties managed until the end of 2025, 271 species of native fauna and 1193 species and subspecies of native flora were identified. Of these, and for mainland Portugal, 5 are classified as Critically Endangered, 15 Endangered, 47 Vulnerable and 34 Near Threatened, according to the International Union for Conservation of Nature classification, and 52 different habitat types included in the Habitats Directive. The result was a slight increase in the number of identified fauna species and habitats, due to the greater effort made and the variety of habitats in the monitored areas. Flora species witnessed a slight decrease due to taxonomic changes, and because the 2025 results had not been fully assessed on December 31, 2025. An increase in this number is expected after the data assessment is concluded.

Monitoring of nesting birds: 3 nesting sites of Bonelli's *eagle (Aquila fasciata*) Vulnerable category (VU), with 2 occupied: 1 successfully, with one flying juvenile in May and another inconclusive. The nest of black stork (*Ciconia nigra*) category Endangered (EN) was monitored, resulting in 1 juvenile.

About 11.9% of this area consists of areas of interest for conservation, of which 4647 hectares are classified as habitats protected by the Natura 2000 Network, divided into 52 types.

In 2025, about 112 hectares were subject to restoration or rehabibitation, to maintain or improve the conservation status of natural and semi-natural habitats, with the continuation of the ecological restoration of Zambujo covering an area of about 110 hectares, with actions to improve the conservation status of the holm oak habitat (9340 *Quercus ilex and Quercus rotundifolia* Forests). In 2025, the first monitoring works were developed, and a project to develop metrics to ascertain the increase in biodiversity is underway.

This initiative, promoted by The Navigator Company in partnership with RAIZ – Forest and Paper Research Institute, has an overall budget of EUR 225 774 79 and is financed by the COMPETE 2020 Program under the measure "Support for climate transition/Resilience of territories to risk: Combating desertification through reforestation and actions that promote the increase of carbon and nutrient fixation in the soil" (REACT-EU/ERDF).

In light of the positive results achieved in 2023 and considering the importance of insects for pollination and the objectives to reverse this decline, the Company continues to plant seedbeds for pollinators and birds in Espirra. In short, the sown land area witnessed a greater number of individuals and almost twice as many species as the unsown area, which means that sowing floristic species considerably increased biodiversity in this particular area.

Test-samplings using environmental DNA (eDNA) techniques were also carried out in two properties managed by the Company, and a study with FCUL for data interpretation is planned for 2026, with completion scheduled for the first half of 2026.

Continuation of the project "Genetic improvement and forest reproductive materials" of the Transform Agenda (RRP), integrating in a particular activity aimed at the conservation of biodiversity this project:

Genetic conservation and recovery of ecosystems, with particular emphasis on some of the most endangered trees in Portugal, such as the Critically Endangered *Quercus canariensis* and related tree species. Recovery of the Monchique oak tree and habitat is included in this project, aimed at increasing the resilience of the Portuguese forest to the effects of climate change. The RRP – Recovery and Resilience Plan supported the idea, which was materialised between the end of 2022 and 2025. The coordination was in charge of RAIZ – Forest and Paper Research Institute, and INIAV – National Institute of Agricultural and Veterinary Research. Navigator's Forestry department, the Polytechnic Institute of Castelo Branco and Viveiros Aliança are involved as partners and the project has the provision of specialised services of BIOPOLIS – CIBIO AND the Botanical Garden of the University of Porto.

In this project, a conservation genomics methodology with almost full genome resolution (WGS) was applied, crossing high-resolution molecular data with detailed ecological analysis and advanced remote sensing tools to assess and safeguard the intraspecific diversity of populations and Monchique oak groves in the Portuguese Southwest region. Includes three-dimensional integration of disciplines:

- Taxonomy and genetics of populations, allowing the identification of non-hybridised individuals and clarifying the dominance of hybrid swarms in the national territory, fine-tuning the phylogenetics of the species in the Southwest of the Iberian Peninsula;
- Field ecology and remote sensing, to map the structural and functional state of relic forests;
- Horticulture and controlled propagation as a basis for concrete actions of genetic restoration and population reinforcement.

The most important nuclei for in situ conservation were singled out, emblematic individuals of high genetic value were identified, ecological conditions were assessed, including structural/compositional diversity and sources of anthropic disturbance, and preliminary actions were outlined for population reinforcement and management and conservation of habitat 9240 in Southwest Portugal, including the Special Conservation Zones and Special Protection Zones of Monchique and the Natural Park of Southwest Alentejo and Costa Vicentina.

Future actions include the creation of orchards, using grafts from individuals of high genetic value found in 3 of the evaluated plots, ensuring the maintenance of indigenous diversity in nurseries and enabling the production of propagules of proven genetic quality. This combination allowed a comprehensive and rigorous evaluation of Monchique oak groves, significantly improving the identification of priority nuclei, the definition of restoration measures and the formulation of

conservation proposals adjusted to the ecological and genetic reality of the species in different sub-areas in the Portuguese Southwest. Summary of project results, (presented by BIOPOLIS-CIBIO at the 23rd National Ecology Meeting): seven oak wood areas previously diagnosed with the presence of individuals with morphology related to *Q. canariensis* were selected, five in Portugal and two in Spain (Algeciras, Andalusia), as well as two oak woods of Portuguese oak, to serve as a reference for the molecular analysis between the two species. In each population, samples comprising 12–18 individuals were collected for molecular studies and morphometric analysis of the leaves; acorns were also collected on an ad hoc basis for propagation via seed, and cuttings were taken from individuals whose morphology suggested a high degree of purity, for grafting and in vitro micropropagation. Spectral and structural information was collected to analyse Portuguese oak tree patches, using an unmanned aerial vehicle equipped with a multispectral image sensor and LiDAR. Image data and point clouds were subsequently compared with terrain data to assess the conservation status of each patch (including information on flora diversity, composition, structure, disturbances and microhabitats).

Molecular studies used total genome resequencing (WGS) of 80 individuals from the nine populations, followed by bioinformatic analysis of the populations' structure. Results showed a geographical pattern of hybridisation towards the Monchique nuclei, with the peripheral populations of the Mira and Ribeiras de Aljezur valleys pointing to high levels of introgression with Portuguese oak. However, the presence of pure individuals in Monchique and in the valleys of the Seixe stream was notorious, even when compared to the populations of southern Spain (Algeciras). In turn, acorn collection allowed the germination of about 1,558 plants obtained from *Q. canariensis, Q. faginea* and *Q. lusitanica,* from 8 different origins, and with germination rates ranging from 20.8% to 87.5%. These will assist restoration and meta-collection actions in different botanical gardens and *arboreta*. In addition, the grafting process was successful in rootstocks of common oak (*Q. robur* subsp. *broteroana*) so that it can be used on a large scale, as well as the micropropagation process, which has already allowed very promising results. In the autumn of 2025, 506 Monchique oaks were planted on the Águas Alves property, in Monchique (in addition to the others planted in previous years), reinforcing not only the population on site, but also within the scope of the project to recover the natural habitats present on the property, including Habitat 9240 Iberian oaks of *Quercus faginea* and *Quercus canariensis*. 100 *Myrica faya* were also planted, which is another element of the relic laurel forests of the Portuguese Southwest, in a holistic approach to the entire ecosystem. Distribution was also started in gardens, university arboretums and private collections, especially in the Southwest, to increase the presence of the species all the way to Odemira and even Grândola, and also by other properties managed by Navigator in that area and others, as ecological projection models indicate that, in the future, the Portuguese Northwest will be the optimal place for Monchique oak.

Integration in the Network of Bird Sanctuaries promoted by SPEA, with spring and autumn/winter censuses being carried out in two properties.

Collaboration with the Faculty of Science of the University of Lisbon and UAveiro in the project http://wildforests.pt/pt/ continued, and the Company logistically supported a new FCT project, called *FORCE – FORest Certification as a tool to preserve vertebrate biodiversity in exotic forestry plantations*, with the main objective of realising the importance of forest certification as a tool to ensure the functional and conservationist role of eucalyptus plantations for vertebrates.

We are partners in the project *Adapting Serras do Porto to Climate Change* LIFE SERRAS DO PORTO (LIFE21 CCA/PT/4476), focused on the forest as its core theme and which includes an integrated set of interventions with a high positive impact on the landscape and ecosystems, in addition to monitoring, dissemination, awareness and civic engagement actions. Among other actions, the Company aims to reinforce compatibility of the productive part with the conservation and adaptation to climate change in that region. Actions are underway to restore and re qualify plots to improve the conservation status of natural habitats in about 55 ha (total area), such as selective control of vegetation, control of invasive species and planting trees and shrubs common to this region, to improve the conservation status of habitats. In 2023 and 2025, monitoring of natural values was carried out, and in 2024 and 2025, water analyses were carried out to assess the ecological status of riparian galleries. These actions are complementary to those carried out by the other partners of this project, allowing an intervention with a positive impact on the landscape and ecosystems. It is also intended to measure the evolution of the intervened plots to assess the positive impact on biodiversity. In addition to the project partners, the Company relied on the support of Montis-ACN and Floradata to achieve the proposed objectives.

Partnership with MONTIS - Association for the Management and Conservation of Nature: Support the development and implementation of specific initiatives of common interest within the scope of this protocol, namely to value, protect and recover biodiversity and soil, on several forest properties managed by Navigator in the North zone. In 2025, a "Walk on the Mau River and Braçal mines" was streamlined, and property evaluation work was developed for proposals for the valorisation and requalification of these areas.

INDIVIDUAL COMMITMENT 3 | By 2026, define a simplified framework, in line with key elements of global frameworks of reference (e.g. Natural Capital Protocol), to systematise the assessment of impacts and dependencies of B&SE, testing the approach in a pilot project.

2025 | Estimated start by 2026, in an alignment of the biodiversity strategy with the LEAP approach of the TNFD.

INDIVIDUAL COMMITMENT 4 | Ensure the use of 80% certified wood by 2030 and promote forest management certification in Portugal.

2025 | 84% (78.52% originating in the national market and 84.18% considering the total origin of certified wood received by Navigator).

93% Wood suppliers with certified chain of custody.

INDIVIDUAL COMMITMENT 5 | By 2030, hold training courses with content related to the theme of B&SE conservation and awareness of good business practices, for internal and external employees.

2025|

Tec4Forest – Training program and transfer of technical information to external parties. 67 sessions, with a total of 672 participants were held, promoting the transfer of technical-scientific knowledge and tools to support forest management, namely programmatic contents integrated in the training on good practices applicable to the main activities of Forest Producer Organisations (FPO) and certification groups.

Programmatic contents integrated in the training on good practices applicable to the main activities (installation of stands, maintenance and exploitation) include guidelines and procedures in the scope of soil and water conservation, preservation of areas of interest for conservation, including protecting water line protection strips, nests and burrows, protection of cultural and archaeological heritage, flora species of interest for the conservation and management of waste resulting from different activities.

Internal training for new employees in the field of forestry projects within the scope of the hierarchy of impact and conservation of biodiversity.

Training course by the Botanical Garden of the University of Porto and Cibio-Biopolis for Viveiros Aliança on propagation by grafting of Monchique oak and forest habitats and particular plant formations of the Southwest Iberian, within the scope of the Monchique oak recovery project.

INDIVIDUAL COMMITMENT 6 | By 2030, promote and/or participate in innovation projects and development of natural-based solutions applicable to the management of natural areas, processes or products.

2025| Continued development of the From Fossil to Forest research agenda projects: use of eucalyptus fibre in the manufacture of rigid moulded cellulose packaging under the gKRAFT Bioshield brand as an alternative to the use of plastic.

Use in nurseries Aliança of cork granulate coating of *ellepots* (production sockets) and also of pots: it contributes very effectively in the control of weed development, namely in the reduction of the incidence rate of the *Marchantia polymorpha* bryophyte and also the control of substrate moisture.

INDIVIDUAL COMMITMENT 7 | Disclose, on a regular basis, information arising from multi stakeholder initiatives that the Company integrates in order to promote, directly or indirectly, the conservation of B&SE.

2025 | Maintenance of the participation of the BCSD Act4nature initiatives and the BCSD Portugal Biodiversity working group. Under the *Natura Connect - Designing a Resilient and Coherent Trans-European Network for Nature and People* project, funded by the European Union, the Company (via the Forestry area) was invited to participate in a think tank that aims to "establish prolific dialogues on the political, socioeconomic and technical challenges associated with the implementation of the European Biodiversity Strategy 2030 in terrestrial systems in mainland Portugal". This think tank includes representatives of civil society, companies, NGOs, academia and other public entities. In 2025, a field trip was organised to a property managed by the Company, focusing on natural value management actions.

Presentation of the biodiversity conservation strategy at a meeting of the Company's Environmental Council.

Participation in meetings organised by several entities, to share knowledge, namely:

- Speaker at the XXIV Meeting of Nature Watchers, with the theme "Biodiversity, Sustainability and Forest Management".

- Participation in the fourth meeting of the TEAMING UP 4 FORESTS initiative dedicated to the theme "Biodiversity conservation and wood production: strategies for sustainable forest management"; this initiative is positioned as a platform for dialogue between scientists, companies and *stakeholders* for the forest to discuss key challenges in the sector.

- Speaker at the webinar "Biodiversity and Corporate Sustainability: From Compliance to Value Creation", organised by the GRACE association in partnership with NBi, The Navigator Company, Sonae MC and Águas do Tejo Atlântico, where the Company's conservation strategy was presented.

Provision of dissemination content on biodiversity and ecosystem services, including Portuguese forest habitats and their importance for conservation on social networks and on Biodiversidade.com.pt platforms.

INDIVIDUAL COMMITMENT 8 | Publicly report, and on an annual basis, the progress made in implementing act4nature Portugal commitments and provide visibility to the Company's main actions under this initiative.

2025 | Progress report available online on The Navigator Company's website.

9.4. Independent Auditor's Limited Assurance Report on Sustainability Statement

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INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON SUSTAINABILITY REPORTING

To the Board of Directors of
The Navigator Company, S.A.

Conclusion of limited assurance

We performed a limited assurance engagement on the Consolidated Sustainability Report of The Navigator Company, S.A. ("Group") included in the "Non-Financial Statement" section of the Management Report (the "Consolidated Sustainability Report") as at 31 December 2025 and for the period from 1 January to 31 December 2025.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Report of The Navigator Company, S.A. as at 31 December 2025 and for the period from 1 January to 31 December 2025 has not been prepared, in all material respects, in accordance with:

- the European Sustainability Reporting Standards (ESRS), including that the process performed by the Group to identify the information reported in the Sustainability Report (the "Process") is in accordance with the description made in chapter 5.1.4.1 – Description of the process to identify and assess material impacts, risks and opportunities (IRO-1); and,
- the disclosures provided for in Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation"), included in chapter 5.2.1 – European Taxonomy.

Basis for conclusion

Our work was performed in accordance with the International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information – ISAE 3000 (Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of the Portuguese Institute of Statutory Auditors (*Ordem dos Revisores Oficiais de Contas*).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained has a reasonable assurance engagement been performed.

Our responsibilities under these standards are described in the "Auditor's responsibilities" section below.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

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Matriculada na Conservatória do Registo Comercial de Lisboa sob o Nº PT 502 161 078

Quality and Independence

We have applied the International Standard on Quality Management (ISQM) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, issued by the IAASB. This standard requires that a comprehensive quality management system be designed, implemented, and maintained including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We comply with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA) and the *Ordem dos Revisores Oficiais de Contas'* code of ethics.

Responsibilities of the Management and the Supervisory body for Sustainability Reporting

It is the responsibility of Management to design, implement and maintain a process for identifying the information to be presented in the Consolidated Sustainability Report, in accordance with the ESRS, and to disclose this process in chapter 5.1.4.1 – Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) of the Consolidated Sustainability Report. This responsibility includes:

- an understanding of the context in which the Group's activities and business relationships take place and how stakeholders may be affected;
- the identification of actual and potential impacts (negative and positive) related to sustainability issues, as well as the risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing or cost of capital in the short, medium or long term;
- assessing the materiality of identified impacts, risks and opportunities related to sustainability matters, by selecting and applying appropriate thresholds; and
- the selection and application of methodologies and the definition of assumptions that are reasonable in the circumstances.

It is also the responsibility of Management:

- preparing the Consolidated Sustainability Report in accordance with the ESRS;
- preparing the disclosures in chapter 5.2.1 – European Taxonomy of the Consolidated Sustainability Report in accordance with Article 8 of the Taxonomy Regulation;
- designing, implementing, and maintaining an appropriate information and internal control system that enables the preparation of the Sustainability Report that is free from material misstatement, whether due to fraud or error; and,
- selecting and applying appropriate methods for preparing the Consolidated Sustainability Report and defining assumptions and estimates about sustainability disclosures that are reasonable in the circumstances.

The Supervisory body is responsible for overseeing the Group's Consolidated Sustainability Reporting process.

Limitations inherent in the preparation of the Consolidated Sustainability Report

When reporting forward-looking information in accordance with ESRS, Management is required to prepare forward-looking information based on disclosed assumptions about events that may occur in the future and possible future actions of the Group. Often, future events don't turn out as expected, so the actual results will probably be different from those predicted.

In determining the disclosures in the Consolidated Sustainability Report, Management makes certain interpretations of legislation or other undefined matters. This type of legislation or other undefined matters can be interpreted differently, including the legal compliance of their interpretation, and are therefore subject to uncertainty.

Auditor's responsibilities

Our goals are to plan and perform the limited assurance engagement on whether the Consolidated Sustainability Report is free from material misstatement, whether due to fraud or error, and to report our limited assurance conclusion to Management. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken based on the Sustainability Report as a whole.

As part of a limited assurance engagement performed in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional scepticism throughout the work.

Our responsibilities regarding the Consolidated Sustainability Report, as far as the Process is concerned, include:

- Obtain an understanding of the Process, but not for the purpose of expressing a conclusion about the effectiveness of the Process, including the outcome of the Process; and
- Design and execute procedures to assess whether the Process is consistent with the Group's description of it, as disclosed in chapter 5.1.4.1 – Description of the process to identify and assess material impacts, risks and opportunities (IRO-1).

Our other responsibilities regarding the Consolidated Sustainability Report include:

- Obtaining an understanding of the control environment, processes and information systems relevant to the Consolidated Sustainability Report, but not to assess the design of particular control activities, obtain evidence of their implementation or test their operational effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error; and
- Design and execute procedures aimed at disclosures in the Consolidated Sustainability Report where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work we did to base our conclusion

A limited assurance engagement involves performing procedures to obtain evidence on the Consolidated Sustainability Report.

We design and execute our procedures to provide a basis for our conclusion. The nature, timing and extent of our procedures depend on our understanding of the Consolidated Sustainability Report and other circumstances of the work, including the identification of disclosures where material misstatements, due to fraud or error, may occur in the Consolidated Sustainability Report.

In performing our limited assurance engagement regarding the Process:

- We obtained an understanding of the Process through:
  i. Interviews with senior management and relevant staff, at corporate and operational level, regarding the sustainability strategy and policies for materially relevant aspects, and their implementation across the different business areas; and
  ii. Analysis of the internal documentation produced by the Group on the Process; and

- We assessed whether the evidence obtained based on our procedures on the Process was consistent with the description of the Process, disclosed in chapter 5.1.4.1 – Description of the process to identify and assess material impacts, risks and opportunities (IRO-1).

In performing our limited assurance engagement regarding the Consolidated Sustainability Report:

- We obtained an understanding of the Group's reporting processes relevant to the preparation of the Sustainability Report by understanding the Group's control environment, processes and information system relevant to the preparation of the Consolidated Sustainability Report, but not for the purpose of expressing a conclusion on the effectiveness of the Group's internal control;
- We assessed whether the material information identified by the Process is included in the Consolidated Sustainability Report;
- We assessed whether the structure and presentation of the Consolidated Sustainability Report complies with the ESRS;
- We performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Consolidated Sustainability Report;
- We performed substantive procedures, on a sample basis, on selected disclosures from the Consolidated Sustainability Report;
- We obtained evidence on the methods, assumptions and data used in the development of material estimates and forward-looking information and on how these methods were applied;
- We gained an understanding of the process for identifying eligible economic activities aligned with the taxonomy, and the corresponding disclosures in the Consolidated Sustainability Report.

10 April 2026

SIGNED ON THE ORIGINAL

KPMG & Associados -
Sociedade de Revisores Oficiais de Contas, S.A.
(no. 189 and registered at CMVM with no. 20161489)
represented by
Rui Filipe Dias Lopes
(ROC no. 1715 and registered at CMVM with no. 20161325)

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INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON THE ADDITIONAL INDICATORS REPORTING

To the Board of Directors of
The Navigator Company, S.A.

Introduction

We were engaged by the Board of Directors of The Navigator Company, S.A. (the "Entity") to perform a limited assurance engagement on the sustainability information included in the Additional Indicators section of Chapter 8.2 – Environmental indicators of the Annual Report (the "Additional Indicators Report") for the year ended 31 December 2025, prepared in accordance with the "Global Reporting Initiative" Standards (the "GRI Standards").

Responsibilities of Management

Management is responsible for:

- the preparation of the sustainability information included in the Additional Indicators Report, in accordance with the GRI Standards (the "Information");
- the design, implementation and maintenance of an appropriate information and internal control system that enables the preparation of the Information to be free from material misstatement, whether due to fraud or error;
- the prevention and detection of fraud and errors and the identification of and compliance with laws and regulations applicable to Navigator's activities; and
- ensuring that Management and personnel involved in the preparation of the Information have the appropriate competencies.

Our responsibilities

Our responsibility is to perform a limited assurance work and to report thereon a conclusion based on the work performed.

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other Than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the other standards and technical guidelines of *Ordem dos Revisores Oficiais de Contas*, which require that we plan and perform our work to obtain limited assurance as to whether nothing has come to our attention that causes we to believe that the sustainability information included in the Additional Indicators Report for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with the GRI Standards. For this purpose, this work included, amongst other procedures, the following:

- conducting interviews with relevant management and personnel, at both corporate and operational levels, regarding the sustainability strategy and policies for materially relevant aspects, and their implementation across the various business areas;

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- conducting interviews with relevant personnel and those responsible for preparing the sustainability information included in the Additional Indicators Report for the year ended 31 December 2025;
- comparing the information presented in the Additional Indicators Report for the year ended 31 December 2025 with the respective source information, to determine whether all relevant information included in those sources has been included in the Report; and
- reading the information presented in the Additional Indicators Report in order to determine whether it is consistent with our general knowledge of Navigator.

The procedures selected depend on our understanding of compliance with the GRI Standards and on other circumstances of the engagement, as well as on our consideration of areas where material misstatements are more likely to arise.

The procedures performed in a limited assurance engagement are different in nature and timing and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We consider that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Quality Management and Independence

We have applied the International Standard on Quality Management (ISQM) 1, which requires a comprehensive quality management system to be designed, implemented, and maintained including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements in the *Ordem dos Revisores Oficiais de Contas'* code of ethics and the International Code of Ethics for Professional Accountants (including international independence standards), (IESBA Code), which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report.

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the sustainability information, included in the Additional Indicators Report for the period ended 31 December 2025, has not been prepared in accordance with the GRI Standards, in all material respects.

Restriction of Use

Our limited assurance report is issued exclusively for the information and use of the Board of Directors of The Navigator Company, S.A., in connection with the disclosure of the Additional Indicators Report, and is not intended to be used for any other purpose. We accept or assume no responsibility and deny any liability to any party other than the Entity for our work, for this limited assurance report, or for the conclusions we have reached.

10 April 2026

SIGNED ON THE ORIGINAL

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represented by
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(ROC no. 1715 and registered at CMVM with no. 20161325)

ANNUAL REPORT 2025

Consolidated Financial Statements

Consolidated Income Statement

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
Revenue	2.1	1,969,765,842	2,088,276,553
Other operating income	2.2	90,442,393	100,793,477
Changes in the fair value of biological assets	3.8	7,593,002	(1,016,252)
Costs of goods sold and materials consumed	4.1	(863,635,390)	(880,548,487)
Changes in production	4.1	(29,680,821)	(3,499,808)
External services and supplies	2.3	(526,671,319)	(500,867,221)
Payroll costs	7.1	(217,701,470)	(203,780,154)
Other operating expenses	2.3	(54,419,327)	(52,595,670)
Net provisions	10.1	3,563,656	(32,178)
Depreciation, amortisation and impairment losses on non-financial assets	3.7	(171,526,711)	(167,860,464)
Operating profit/ (loss)		**207,729,855**	**378,869,796**
Financial income and gains	5.10	9,561,167	17,376,371
Financial expenses and losses	5.10	(41,504,237)	(43,215,938)
Net financial results		**(31,943,070)**	**(25,839,567)**
Profit before income tax		175,786,785	**353,030,229**
Income tax	6.1	(31,093,828)	(66,046,016)
Net profit for the period		**144,692,957**	**286,984,213**
Attributable to Navigator's equity holders		144,667,435	286,948,195
Attributable to non-controlling interests	5.6	25,522	36,018
Earnings per share			
Basic earnings per share, Eur	5.3	0.203	0.403
Diluted earnings per share, Eur	5.3	0.203	0.403

Consolidated statement of comprehensive income

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
Net profit for the period			
before non-controlling interests		**144,692,957**	**286,984,213**
Items that may be reclassified to the income statement			
Hedging derivative financial instruments			
Changes in fair value	8.2	(15,935,709)	(1,526,544)
Tax effect		4,227,027	639,231
Currency translation differences		(7,271,461)	8,287,642
Items that may not be reclassified to the income statement			
Remeasurement of post-employment benefits			
Remeasurement	7.2.5	8,787,204	563,776
Tax effect	7.2.5	(2,245,847)	17,693
Comprehensive income of associates and joint ventures		-	-
Total other comprehensive income net of taxes		**(12,438,786)**	**7,981,798**
Total comprehensive income		**132,254,171**	**294,966,011**
Attributable to:			
Navigator's equity holders		132,224,673	294,932,682
Non-controlling interests		29,498	33,329
		132,254,171	**294,966,011**

Consolidated statement of financial position

As at 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
ASSETS			
Non-current assets			
Goodwill	3.1	420,580,669	422,627,337
Intangible assets	3.2	107,637,839	119,600,687
Property, plant and equipment	3.3	1,462,499,503	1,415,945,085
Right-of-use assets	3.6	120,068,177	98,651,166
Biological assets	3.8	120,646,643	115,250,198
Investment properties	3.4	669,397	360,170
Other financial assets	7.2	9,355,504	1,347,318
Non-current receivables	4.2	1,975,387	13,142,937
Deferred tax assets	6.2	47,635,415	59,110,851
		2,291,068,534	**2,246,035,749**
Current assets			
Inventories	4.1	306,285,542	303,198,367
Current receivables	4.2	420,298,809	496,698,621
Income tax	6.1	40,640,998	20,621,461
Cash and cash equivalents	5.9	130,229,469	286,628,866
		897,454,818	**1,107,147,315**
Total Assets		**3,188,523,352**	**3,353,183,064**
EQUITY AND LIABILITIES			
Capital and reserves			
Share capital	5.2	500,000,000	500,000,000
Currency translation reserve	5.5	6,557,946	13,829,407
Fair value reserve	5.5	302,772	12,011,454
Legal reserve	5.5	100,000,000	100,000,000
Other reserves	5.5	(6,181,061)	(5,960,836)
Retained earnings	5.5	667,391,938	548,900,068
Net profit for the period		144,667,435	286,948,195
Early dividends	5.4	-	(99,999,451)
Equity attributable to Navigator's equity holders		**1,412,739,030**	**1,355,728,837**
Non-controlling interests	5.6	389,845	360,347
Total Equity		**1,413,128,875**	**1,356,089,184**
Non-current liabilities			
Interest-bearing liabilities	5.7	762,828,265	726,229,071
Lease liabilities	5.8	120,381,320	98,627,669
Deferred tax liabilities	6.2	120,304,424	135,938,603
Provisions	10.1	25,426,997	28,371,069
Non-current payables	4.3	110,112,440	117,161,513
		1,139,053,446	**1,106,327,925**
Current liabilities			
Interest-bearing liabilities	5.7	71,030,074	177,748,681
Lease liabilities	5.8	12,148,348	13,109,231
Current payables	4.3	535,529,542	658,569,674
Income tax	6.1	17,633,067	41,338,369
		636,341,031	**890,765,955**
Total Liabilities		**1,775,394,477**	**1,997,093,880**
Total Equity and Liabilities		**3,188,523,352**	**3,353,183,064**

Statement of Changes in Equity

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Note	Share capital	Currency translation reserve	Fair value reserves	Legal reserves	Other reserves	Retained earnings	Net profit for the period	Early dividends	Total	Non-controlling interests	Total
Equity as at 1 January 2025		**500,000,000**	**13,829,407**	**12,011,454**	**100,000,000**	**(5,960,836)**	**548,900,068**	**286,948,195**	**(99,999,451)**	**1,355,728,837**	**360,347**	**1,356,089,184**
Net profit for the period		-	-	-	-	-	-	144,667,435	-	144,667,435	25,522	144,692,957
Other comprehensive income (net of taxes)		-	(7,271,461)	(11,708,682)	-	-	6,537,381	-	-	(12,442,762)	3,976	(12,438,786)
Total comprehensive income for the period		**-**	**(7,271,461)**	**(11,708,682)**	**-**	**-**	**6,537,381**	**144,667,435**	**-**	**132,224,673**	**29,498**	**132,254,171**
Appropriation of 2024 net profit for the period:												
- Dividends paid	5.4	-	-	-	-	-	(74,994,255)	-	-	(74,994,255)	-	(74,994,255)
- Appropriation of prior period's net profit		-	-	-	-	-	305,948,195	(286,948,195)	-	19,000,000	-	19,000,000
- Bonus to employees		-	-	-	-	-	(19,000,000)	-	-	(19,000,000)	-	(19,000,000)
Early dividends	5.4	-	-	-	-	-	(99,999,451)	-	99,999,451	-	-	-
Acquisitions/Disposals of non-controlling interests	5.5	-	-	-	-	(220,225)	-	-	-	(220,225)	-	(220,225)
Total transactions with shareholders		**-**	**-**	**-**	**-**	**(220,225)**	**111,954,489**	**(286,948,195)**	**99,999,451**	**(75,214,480)**	**-**	**(75,214,480)**
Equity as at 31 December 2025		**500,000,000**	**6,557,946**	**302,772**	**100,000,000**	**(6,181,061)**	**667,391,938**	**144,667,435**	**-**	**1,412,739,030**	**389,845**	**1,413,128,875**

Amounts in Euros	Note	Share capital	Currency translation reserve	Fair value reserves	Legal reserves	Other reserves	Retained earnings	Net profit for the period	Early dividends	Total	Non-controlling interests	Total
Equity as at 1 January 2024		**500,000,000**	**5,309,023**	**12,898,767**	**100,000,000**	**3,481,014**	**418,633,191**	**274,923,820**	**-**	**1,315,245,815**	**327,018**	**1,315,572,833**
Net profit for the period		-	-	-	-	-	-	286,948,195	-	286,948,195	36,018	286,984,213
Other comprehensive income (net of taxes)		-	8,287,642	(887,313)	-	-	584,158	-	-	7,984,487	(2,689)	7,981,798
Total comprehensive income for the period		**-**	**8,287,642**	**(887,313)**	**-**	**-**	**584,158**	**286,948,195**	**-**	**294,932,682**	**33,329**	**294,966,011**
Appropriation of 2023 net profit for the period:												
- Dividends paid	5.4	-	-	-	-	-	(149,995,621)	-		(149,995,621)	-	(149,995,621)
- Appropriation of prior period's net profit		-	-	-	-	-	288,923,820	(274,923,820)	-	14,000,000	-	14,000,000
- Bonus to employees		-	-	-	-	-	(14,000,000)	-	-	(14,000,000)	-	(14,000,000)
Early dividends	5.4	-	-	-	-	-	-	-	(99,999,451)	(99,999,451)	-	(99,999,451)
Acquisitions/Disposals of non-controlling interests	5.5	-	-	-	-	(9,441,850)	4,987,262	-	-	(4,454,588)	-	(4,454,588)
Other movements		-	232,742	-	-	-	(232,742)	-		-	-	-
Total transactions with shareholders		**-**	**232,742**	**-**	**-**	**(9,441,850)**	**129,682,719**	**(274,923,820)**	**(99,999,451)**	**(254,449,660)**	**-**	**(254,449,660)**
Equity as at 31 December 2024		**500,000,000**	**13,829,407**	**12,011,454**	**100,000,000**	**(5,960,836)**	**548,900,068**	**286,948,195**	**(99,999,451)**	**1,355,728,837**	**360,347**	**1,356,089,184**

Consolidated Statement of Cash Flows

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Notes	2025	2024
OPERATING ACTIVITIES			
Receipts from customers		2,075,756,170	2,155,210,508
Payments to suppliers		(1,595,913,522)	(1,549,556,848)
Payments to employees		(174,482,041)	(162,689,686)
Cash flows from operations		**305,360,607**	**442,963,974**
Income tax received/ (paid)	6.1.2	(75,474,262)	(61,094,930)
Other receipts/ (payments) relating to operating activities		103,138,551	29,625,402
Cash flows from operating activities (1)		**333,024,896**	**411,494,446**
INVESTING ACTIVITIES			
Inflows:			
Property, plant and equipment		191,663	371,904
		191,663	**371,904**
Outflows:			
Property, plant and equipment		(236,386,902)	(223,709,648)
Intangible assets		(568,564)	(391,306)
Investments in subsidiaries	3.1	-	(150,779,060)
		(236,955,466)	**(374,880,014)**
Cash flows from investing activities (2)		**(236,763,803)**	**(374,508,110)**
FINANCING ACTIVITIES			
Inflows:			
Interest-bearing liabilities	5.7	395,730,003	352,162,243
Government grants	3.5	34,335,961	43,952,298
		430,065,964	**396,114,541**
Outflows:			
Interest-bearing liabilities	5.7	(458,010,468)	(124,542,159)
Amortisation of lease agreements	5.8	(19,093,912)	(15,661,601)
Interest and similar expense		(22,545,208)	(18,934,665)
Distribution of dividends	5.4	(174,993,706)	(149,995,621)
Repayable grants	5.7	(7,216,435)	(7,219,439)
		(681,859,729)	**(316,353,485)**
Cash flows from financing activities (3)		**(251,793,765)**	**79,761,056**
CHANGES IN CASH AND CASH EQUIVALENTS (1)+(2)+(3)		**(155,532,672)**	**116,747,392**
Effect of exchange rate differences		(866,725)	416,507
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE PERIOD	5.9	**286,628,866**	**169,464,967**
CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD	5.9	**130,229,469**	**286,628,866**

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1. Introduction

The following symbols are used in the presentation of the Notes to the financial statements:

Accounting policies

This symbol indicates the disclosure of accounting policies specifically applicable to the items in the respective Note.

Significant Estimates and Judgements

This symbol indicates the disclosure of the estimates and/or judgements made regarding the items in the respective Note. Significant estimates and judgements are indicated in Note 1.5.

References

This symbol indicates a reference to another Note or another section of the Financial Statements were more information about the items disclosed is presented.

1.1. The Group

The Navigator Group (Group) comprises by The Navigator Company, S.A., whose name remained unchanged during the period and its subsidiaries.

The Navigator Group was created in 1953, when a group of technicians from "Companhia Portuguesa de Celulose de Cacia" made this company the first in the world to produce bleached eucalyptus sulphate pulp.

In 1976 Portucel EP was created as a result of the nationalisation of all of Portugal's cellulose industry. As such, Portucel – Empresa de Celulose e Papel de Portugal, E.P. resulted from the merger with CPC – Companhia de Celulose, S.A.R.L. (Cacia), Socel – Sociedade Industrial de Celulose, S.A.R.L. (Setúbal), Celtejo – Celulose do Tejo, S.A.R.L. (Vila Velha de Ródão), Celnorte – Celulose do Norte, S.A.R.L. (Viana do Castelo) and Celuloses do Guadiana, S.A.R.L. (Mourão) incorporated Portucel - Empresa de Celulose e Papel de Portugal, E.P., converted into a Public Limited Company of mainly public capital by Decree-Law 405/90, of 21 December.

Years after, as a result of the restructuring of Portucel – Empresa de Celulose e Papel de Portugal, S.A., which was renamed Portucel, SGPS, S.A., towards its privatisation, Portucel S.A. was created, on 31 May 1993, through Decree-law 39/93, of 13 February, with the former assets of the two main companies, based in Aveiro and Setúbal.

In 1995, the Company was privatised and became a publicly traded company.

Aiming to restructure the paper industry in Portugal, Portucel acquired Papéis Inapa, S.A. (Setúbal), in 2000, and Soporcel – Sociedade Portuguesa de Papel, S.A. (Figueira da Foz), in 2001. Those key strategic decisions resulted in the Portucel Soporcel Group (currently Navigator Group), which is currently the largest European and one of the world's largest producers of bleached eucalyptus pulp and the largest European producer of uncoated wood-free paper (UWF), with a capacity of 1.6 and 1.6 millions of tonnes, respectively, and it sells approximately 347 thousand tonnes of pulp (389 thousand tonnes in 2024), annually, integrating the remainder in the production of UWF paper and Tissue paper.

In June 2004, the Portuguese State sold 30% of Portucel's equity, which was acquired by the Semapa Group. In September of the same year, Semapa launched a public acquisition offer tending to secure the Group's control, which was accomplished by guaranteeing a 67.1% stake of Portucel's equity.

In November 2006, the Portuguese State concluded the third and final stage of the sale of Portucel, S.A., and Parpública, SGPS, S.A. (formerly Portucel, SGPS, S.A.) sold the remaining 25.72% it still held, thus increasing the free-float.

From 2009 to June 2015, more than 75% of the Company's share capital was held, directly and indirectly, by Semapa – Sociedade de Investimento e Gestão SGPS, S.A. (excluding treasury shares) having the percentage of voting rights been reduced to around 70% following the conclusion of the offer for the acquisition, in the form of an exchange offer, of the ordinary shares of Semapa in July 2015. Since June 2024, this percentage has stood at 70.03%.

In February 2015, the Group started its activity in the Tissue segment with the acquisition of AMS-BR Star Paper, S.A. (currently denominated Navigator Tissue Ródão, S.A.), a Company that holds and explores a tissue paper mill, located in Vila Velha de Ródão. A new industrial facility was built in Aveiro, in August 2018, being operated by Navigator Tissue Aveiro, S.A., which is currently the largest Portuguese producer and the third in the Iberian Peninsula, with a production and transformation capacity of 130 thousand tonnes and 120 thousand tonnes, respectively.

On 31 March 2023 the acquisition of the Gomà-Camps Group's consumer Tissue business in Spain was concluded, with a view to strengthening the Group's presence in this business segment. The integration of this new mill has elevated Navigator to the position of second largest Iberian tissue producer, with a production capacity of 165 thousand tonnes and a converting capacity of 180 thousand tonnes.

In May 2024, The Navigator Company acquired all the shares representing the share capital of Accrol Group Holdings plc ("Accrol"), one of the leaders in the tissue paper converting segment in the United Kingdom, producing private label toilet rolls, kitchen rolls and facial tissues for most of the main UK retailers, bringing total converting capacity to 310 thousand tonnes.

In 2026, the Navigator Group approved a strategic investment in the tissue segment, involving the installation of a new production machine at its industrial complex in Aveiro, with an annual production capacity of 70,000 tonnes, thereby strengthening its industrial base in Portugal and the vertical integration of its operations, particularly in supplying its converting facility in the United Kingdom.

This project, scheduled to begin in 2028 with a total investment of approximately Euro 115 million, will improve operational efficiency, reduce reliance on external suppliers, and develop solutions better aligned with customer needs. It has been included in the Investment Contract Scheme under the Portugal 2030 initiative, in line with the Group's strategy for sustainable growth and long-term value creation.

The Group's main business is the production and sale of writing and printing thin paper (UWF) and domestic consumption paper (Tissue), and it is present in the entire value-added chain, from research and development of forestry and agricultural production to the purchase and sale of wood and the production and sale of bleached eucalyptus kraft pulp – BEKP – and electric and thermal energy, as well as its commercialisation.

The Navigator Company, S.A. (hereafter referred to as The Navigator Company or Company) is a publicly traded company, listed in Euronext Lisbon, with its share capital represented by nominal shares.

Company: The Navigator Company, S.A.

Head Office: Mitrena – Apartado 55 | 2901-861 Setúbal | Portugal

Legal Form: Public Limited Company

Share Capital: Euro 500,000,000

TIN: 503 025 798

Shares Issued: 711,183,069

A more detailed description of the activity in each business line of the Group is disclosed in Note 2.1 – Revenue and segment reporting.

Navigator is included in the consolidation perimeter of Semapa – Sociedade de Investimento e Gestão, SGPS, S.A., the Parent Company, and Sodim, SGPS, S.A., the final controlling entity.

In turn, Filipa Mendes de Almeida de Queiroz Pereira, Mafalda Mendes de Almeida de Queiroz Pereira and Lua Mónica Mendes de Almeida de Queiroz Pereira hold joint control of Sodim - SGPS, S.A. (Sodim) through the combination of a shareholders' agreement. (Sodim) with their respective direct and indirect shareholdings in the share capital of this company, joint control of Sodim, Semapa and Navigator is attributable to each of them and to Sodim, under the terms of Article 20 of the Portuguese Securities Code, 83.221% of the non-suspended voting rights relating to shares representing the share capital of Semapa and also to each of them, Sodim and Semapa, 70.03% of the non-suspended voting rights relating to shares representing the share capital of Navigator.

1.2. Subsequent Events

Storm Kristin

During the first quarter of 2026, Portugal was hit by a number of severe weather events, most notably Storm Kristin, which brought extreme weather conditions, including strong winds, heavy rainfall and flooding, with a significant impact on several regions, particularly the Central region.

These adverse conditions temporarily affected some of the Navigator Group’s forest areas and industrial operations at the Figueira da Foz and Vila Velha de Ródão facilities, mainly due to external disruptions to the electricity and water supplies.

No significant damage to stock or essential equipment was reported, and most risks are covered by current insurance policies.

Production resumed a few days later, as soon as essential supplies had been restored, whilst the Group’s other industrial facilities continued to operate as normal. Concurrently, the Group has been gradually recovering from the logistical constraints caused by the weather conditions, with operational and logistics teams having implemented measures to ensure a swift and sustained recovery, thereby ensuring compliance with trade commitments and the stability of operations.

US Supreme Court ruling on trade tariffs

Following court rulings rendered in the United States in February and March 2026, the US Supreme Court and the US Court of International Trade ruled that the trade tariffs imposed in 2025 under the International Emergency Economic Powers Act (IEEPA) were unlawful, ordering their cessation and the refund of amounts unduly charged to the affected importers.

As a result of these decisions, US customs authorities were instructed to recalculate the duties on the imports concerned and to refund the duties paid, including interest, in respect of eligible transactions.

Based on the information currently available and the analysis carried out, Navigator estimates that it may be refunded an amount of approximately Euro 4.3 million, plus interest, corresponding to charges previously incurred. As at the reporting date, the refund process is still ongoing, pending administrative processing by the US authorities; accordingly, there is no certainty at this stage as to the timing of receipt.Navigator will continue to monitor the progress of the process and will recognise the related amounts in its accounts in accordance with the applicable standards once the necessary conditions have been met.

There were no events, other than those mentioned, that resulted in additional adjustments or disclosures in the Group's consolidated financial statements in the period ended 31 December 2025.

Conflict in the Middle East

Following the end of the reporting period, there was an escalation of the military conflict in the Middle East, resulting in significant disruptions to international trade and logistics routes, as well as increased volatility in energy markets, particularly oil and natural gas.

These events occurred after the reporting date and do not affect the circumstances as at 31 December 2025. At the date of approval of the financial statements, the Board of Directors had not identified any material direct effects on the Group’s operations, financial position or performance. Nevertheless, developments in the situation may affect energy costs, supply chains and other operational factors in future periods.
The Board of Directors continues to monitor the international situation and will take whatever measures it deems appropriate to mitigate any potential adverse impacts.

1.3. Basis of Preparation

1.3.1. Authorisation to issue financial statements

These consolidated financial statements were approved by the Board of Directors on 20 March 2026. However, they are still subject to approval by the General Shareholders Meeting, in accordance with the Portuguese commercial legislation.

The Group’s senior management, which are the members of the Board of Directors who sign this report, declare that, to the best of their knowledge, the information contained herein was prepared in conformity with the applicable accounting standards, providing a true and fair view of the assets and liabilities, the financial position and results of the companies included in the Group’s consolidation perimeter.

1.3.2. Accounting principles

The consolidated financial statements for the period ended 31 December 2025 were prepared in accordance with the International Financial Reporting Standards (IFRS), effective 1 January 2025 and as adopted by the European Union.

1.3.3. Perimeter of consolidation

1.3.3.1. Subsidiaries

Subsidiaries are all entities over which the Group has control, which occurs when the Group is exposed or entitled to the variable returns resulting from its involvement with the entities and has the capacity to affect that return through the exercise of power over the entities, regardless of the percentage they hold over equity.

The existence and the effect of potential voting rights which are currently exercisable, or convertible are considered when the Group assesses whether it has control over another entity.

Subsidiaries are consolidated using the full consolidation method with effect from the date on which control is transferred to the Group while they are excluded as from the date control ceases.

These companies' equity and net profit corresponding to the third-party investment in such companies are presented under non-controlling interests in the consolidated statement of financial position (in a separate component of equity) and in the Consolidated income statement. The companies included in the consolidated financial statements are detailed in Note 11.

The purchase method is used in recording the acquisition of subsidiaries. The cost of an acquisition is measured by the fair value of the assets transferred, the equity instruments issued, and liabilities incurred or assumed on acquisition date, and the best estimate of any agreed contingent payment.

The identifiable assets and liabilities acquired, and contingent liabilities assumed in a business combination are initially measured at fair value on the date of acquisition, irrespective of the existence of non-controlling interests. The excess of the acquisition cost over the fair value of the Group's share of the identifiable assets and liabilities acquired is recorded as goodwill, as described in Note 3.1.

If the acquisition cost is less than the fair value of the net assets of the acquired subsidiary (negative goodwill), the difference is recognised directly in the Income Statement in the period it takes place.

Transaction costs directly attributable to the acquisition are immediately expensed.

Intercompany transactions, balances, unrealised gains on transactions and dividends distributed between group companies are eliminated. Unrealised losses are also eliminated, except where the transaction displays evidence of impairment of a transferred asset.

When, at the date of the acquisition of control, The Navigator Company already holds a previously acquired interest in the subsidiary, its fair value is considered in determining the goodwill or negative goodwill.

On a step acquisition process resulting in the acquisition of control, the revaluation of any participation previously held is recognised against the income statement when Goodwill is calculated.

When subsequent transactions of disposal or acquisition of shares with non-controlling interests with no impact in control take place, no gain, loss or goodwill is determined, and the differences between the transaction cost and the book value of the share acquired are recognised in equity.

Losses generated in each period by subsidiaries with non-controlling interests are allocated, in the percentage held, to non-controlling interests, regardless of whether they become negative.

In the case of disposals of interests, resulting in a loss of control over a subsidiary, any remaining interest is revalued to the market value at the date of sale, and the gain or loss resulting from such revaluation, is recorded against profit or loss, as well as the gain or loss resulting from such disposal.

The subsidiaries' accounting policies are adjusted, whenever necessary, so as to ensure that they are applied consistently by all the Group's companies.

1.3.3.2. Associates

Associates are all the entities in which the Group exercises significant influence but do not have control, which is generally the case with investments representing between 20% and 50% of the voting rights. Investments in associates are accounted under the equity method.

In accordance with the equity method, financial investments are recorded at their acquisition cost, adjusted by the amount corresponding to the Group's share of changes in the associates' Shareholders' equity (including net income/loss) with a corresponding gain or loss recognised for the period on earnings or on changes in capital, and by dividends received.

Differences between the acquisition cost and the fair value of the assets and liabilities attributable to the associate on the acquisition date are, if positive, recognised as Goodwill and recorded as investments in associated. If negative, goodwill is recorded as profit for the period under the caption Group share of (loss)/gains of associates and joint ventures.

Transaction costs directly attributable to the acquisition are immediately expensed.

In the event that impairment loss indicators arise on investments in associates, an evaluation of the potential impairment is made, and if deemed necessary, a loss is recognised in the consolidated income statement.

When the Group's share of losses in associate companies equals or exceeds its investment in that associate, the Group ceases the recognition of additional losses, unless it has incurred in liabilities or has made payments on behalf of that associate.

Unrealised gains on transactions with associates are eliminated to the extent of the Navigator Group's investment in the associates. Unrealised losses are also eliminated, except where the transaction displays evidence of impairment of a transferred asset.

The associates' accounting policies used in the preparation of the individual financial statements are adjusted, whenever necessary, so as to ensure consistency with the policies adopted by the Group.

1.3.4. Presentation currency and foreign currency transactions

i. Functional and reporting currency

The items included in the Financial Statements of each one of the Group's entities are measured using the currency of the economic environment in which the entity operates (functional currency).

These consolidated financial statements are presented in Euro, which is the Group's functional and reporting currency.

ii. Balances and Transactions expressed in foreign currencies

All the Group's assets and liabilities denominated in currencies other than the reporting currency have been translated to Euro using the exchange rates prevailing at the consolidated statement of financial position date (Note 8.1.1).

Currency adjustments, favourable and unfavourable, arising from differences between the exchange rates prevailing at the date of the transaction and those at the date of collection, payment, or statement of financial position, are recorded as income and/or expenses in the Consolidated income statement for the period.

iii. Group companies

The profit or loss and the financial position of the Group's entities which have a different functional currency from the Group's reporting currency are translated into the reporting currency as follows:

i. The assets and liabilities of each Statement of financial position are translated at the exchange rates prevailing at the date of the consolidated statement of financial position;

ii. Equity balances are translated at the historical exchange rate;

iii. The income and expenses disclosed in the Income Statement are converted at the exchange rate prevailing at the dates of the transactions. When this is not possible or when benefits do not arise from the use of this procedure, income and expenses are translated at the average exchange rate of the period.

The exchange differences resulting from the topics i) and iii) are recognised in the Consolidated comprehensive income under the equity caption Currency translation reserves, being transferred to Net financial results when the disposal of the investments occur.

Long-term loans granted to subsidiaries in currencies other than the Group's functional currency, which are neither planned nor likely to be settled in the foreseeable future, are treated as a net extension of the investment in the foreign subsidiary. On this basis, exchange rate differences arising on these loans, which have not been eliminated on consolidation, are recognised in Comprehensive income under Currency translation reserves, being transferred to profit or loss for the period when the loans are settled, to the extent that such settlement represents an absolute reduction in the subsidiary's interest and exposure.

iv. Exchange rates used

	31/12/2025	31/12/2024	Appreciation / (Depreciation)
GBP (Sterling pound)			
Average exchange rate for the period	0.8570	0.8466	-1.23%
Closing exchange rate for the period	0.8726	0.8292	-5.24%
USD (American dollar)			
Average exchange rate for the period	1.1307	1.0824	-4.46%
Closing exchange rate for the period	1.1750	1.0389	-13.10%
PLN (Polish zloty)			
Average exchange rate for the period	4.2403	4.3058	1.52%
Closing exchange rate for the period	4.2210	4.2750	1.26%
SEK (Swedish krona)			
Average exchange rate for the period	11.0656	11.4325	3.21%
Closing exchange rate for the period	10.8215	11.4590	5.56%
CZK (Czech krona)			
Average exchange rate for the period	24.6849	25.1198	1.73%
Closing exchange rate for the period	24.2370	25.1850	3.76%
CHF (Swiss franc)			
Average exchange rate for the period	0.9370	0.9526	1.64%
Closing exchange rate for the period	0.9314	0.9412	1.04%
DKK (Danish krone)			
Average exchange rate for the period	7.4634	7.4589	-0.06%
Closing exchange rate for the period	7.4689	7.4578	-0.15%
HUF (Hungarian forint)			
Average exchange rate for the period	397.7234	395.3039	-0.61%
Closing exchange rate for the period	385.1500	411.3500	6.37%
AUD (Australian dollar)			
Average exchange rate for the period	1.7527	1.6397	-6.89%
Closing exchange rate for the period	1.7581	1.6772	-4.82%
MZN (Mozambican metical)			
Average exchange rate for the period	72.2667	69.1732	-4.47%
Closing exchange rate for the period	75.0100	66.7900	-12.31%
MAD (Moroccan dirham)			
Average exchange rate for the period	10.5511	10.7549	1.89%
Closing exchange rate for the period	10.7121	10.5190	-1.84%
NOK (Norway krona)			
Average exchange rate for the period	11.7191	11.6290	-0.77%
Closing exchange rate for the period	11.8430	11.7950	-0.41%
MXN (Mexican peso)			
Average exchange rate for the period	21.6737	19.8314	-9.29%
Closing exchange rate for the period	21.1180	21.5504	2.01%
AED (Dirham)			
Average exchange rate for the period	4.1499	3.9751	-4.40%
Closing exchange rate for the period	4.3152	3.8154	-13.10%
CAD (Canadian dollar)			
Average exchange rate for the period	1.5795	1.4821	-6.57%
Closing exchange rate for the period	1.6088	1.4948	-7.63%
ZAR (South African rand)			
Average exchange rate for the period	20.1540	19.8297	-1.64%
Closing exchange rate for the period	19.4439	19.6188	0.89%
BRL (Brazilian real)			
Average exchange rate for the period	6.2936	5.8283	-7.98%
Closing exchange rate for the period	6.4364	6.4253	-0.17%
EGP (Egyptian pound)			
Average exchange rate for the period	55.5640	49.1213	-13.12%
Closing exchange rate for the period	56.1247	53.0349	-5.83%
TRY (Turkish lira)			
Average exchange rate for the period	44.8699	35.5734	-26.13%
Closing exchange rate for the period	50.4838	36.7372	-37.42%

1.3.5. Basis for measurement

The accompanying consolidated financial statements have been prepared on the going concern basis from the accounting books and records of the companies included in the consolidation (Note 11.1), and under the historical cost convention, except for biological assets (Note 3.8), and for financial instruments measured at fair value through profit or loss or at fair value through other comprehensive income (Note 8.3), in which derivative financial instruments are included (Note 8.2). The liability related to responsibilities for defined benefits is recognised at its present value deducted from the respective asset.

1.3.6. Comparability

These consolidated financial statements are comparable in all material respects with those of the previous year.

1.4. New IFRS standards adopted and to be adopted

1.4.1. Other standards, amendments and interpretations adopted or to be adopted

Standards, amendments and interpretations adopted in 2025

	Amendment	Date of application
Standards and amendments endorsed by the European Union		
Amendments to IAS 21 - The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability	On August 15, 2023, the International Accounting Standards Board (the IASB or Board) issued Lack of Exchangeability (Amendments to IAS 21 – The Effects of Changes in Foreign Exchange Rates) (the amendments). The amendments clarify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. An entity assesses whether a currency is exchangeable into another currency at a measurement date and for a specified purpose. When a currency is not exchangeable, the entity has to estimate a spot exchange rate. According to the amendments, entities will have to provide new disclosures to help users assess the impact of using an estimated exchange rate on financial statements. These disclosures may include: a) the nature and financial effects of the currency not being exchangeable into the other currency; b) the spot exchange rate(s) used; c) the estimation process; and d) the risks to which the entity is exposed because of the currency not being exchangeable into the other currency. The amendment did not have a significant impact on the Navigator Group.	1 January 2025

	Amendment	Date of application
Standards and amendments endorsed by the European Union that the Group has opted not to apply in advance		
Annual improvements	On 18 July 2024, the International Accounting Standards Board (IASB) issued limited amendments to the IFRS and respective guidelines, resulting from the regular maintenance carried out on the Standards. The amendments include clarifications, simplifications, corrections and modifications made with the aim of improving the consistency of various IFRS. The IASB amended: a) **IFRS 1 First-time Adoption of International Financial Reporting Standards, to clarify certain aspects related to the application of hedge accounting by an entity that is preparing financia**l statements in accordance with IFRS for the first time; b) **IFRS 7 Financial Instruments:** Disclosures and the respective Implementation Guidance, in order to clarify: - The application guidance, regarding Gain and loss on derecognition; and - The implementation guidance, namely its Introduction, Fair value paragraph (disclosures regarding the difference between fair value and transaction price) and Credit risk disclosure. c) **IFRS 9 Financial Instruments** to: - Require companies to initially measure a receivable without a significant financing component at the amount determined by applying IFRS 15, and - Clarify that when a lease liability is derecognised, the derecognition is accounted for under IFRS 9. However, when a lease liability is modified, the modification is accounted for under IFRS 16 Leases. The amendment establishes that when lease liabilities are derecognised under IFRS 9, the difference between the carrying amount and the consideration paid is recognised in profit or loss. d) **IFRS 10 Consolidated Financial Statements**, clarification on the determination of a "de facto agent"; and e) **IAS 7 Cash Flow Statements**, amendment of detail in the paragraph relating to Investments in subsidiaries, associates and joint ventures. This amendment is effective for periods starting after 1 January 2026. Earlier application is permitted.	1 January 2026
IFRS 9 - Amendments to the Classification and Measurement of Financial Instruments	On 30 May 2024, the International Accounting Standards Board (IASB or Board) issued amendments regarding the classification and measurement requirements of IFRS 9 Financial Instruments. The amendments aim to resolve the diversity in the application of the standard, making the requirements more understandable and consistent. The purpose of these amendments is to: a) - Clarify the classification of financial assets with environmental, social and corporate governance (ESG) characteristics and similar, since these characteristics in loans can affect whether loans are measured at amortised cost or fair value. To resolve any potential diversity in practical application, the amendments clarify how the contractual cash flows of loans should be valued. b) - Clarify the date on which a financial asset or financial liability is derecognised when it is settled through electronic payment systems. There is an accounting policy option that allows a financial liability to be Derecognised before the cash is delivered on the settlement date, if certain criteria are met. c) - Improve the description of the term "non-recourse", according to the amendments, a financial asset has non-recourse characteristics if the ultimate right to receive cash flows from an entity is contractually limited to the cash flows generated by specific assets. The presence of non-recourse features does not necessarily exclude the financial asset from complying with the SPPI, but its characteristics need to be carefully analysed. d) - Clarify that a contractually linked instrument must have a cascading payment structure that creates a concentration of credit risk by allocating losses disproportionately between different instalments. The underlying pool can include financial instruments that are not within the scope of the classification and measurement of IFRS 9 (*e.g.*, finance leases) but must have cash flows equivalent to the SPPI criterion. The IASB has also introduced additional disclosure requirements relating to equity investments designated at fair value through other comprehensive income and financial instruments with contingent features, for example features linked to ESG targets. These amendments are effective for periods beginning on or after 1 January 2026. Earlier adoption is permitted.	1 January 2026

	Amendment	Date of application
Amendments to IFRS 9 and IFRS 7 - Contracts Referencing Nature-dependent Electricity	On 18 December 2024, the International Accounting Standards Board (IASB) issued amendments to help companies better report the financial effects of nature-dependent electricity contracts, which are often structured as power purchase agreements (PPA). Nature-dependent electricity contracts help companies to secure their electricity supply from sources such as wind and solar power. The amount of electricity generated under these contracts can vary based on uncontrollable factors such as weather conditions. Current accounting requirements may not adequately capture how these contracts affect a company's performance. To allow companies to better reflect these contracts in the financial statements, the IASB has made targeted amendments to IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures. The amendments include: a) Clarifying the application of the "own-use" requirements; b) Permitting hedge accounting if these contracts are used as hedging instruments; and c) Adding new disclosure requirements to enable investors to understand the effect of these contracts on a company's financial performance and cash flows. The amendments are effective for periods beginning on or after 1 January 2026. Early application is permitted.	1 January 2026
IFRS 18 - Presentation and disclosure in financial statements	On 9 April 2024, the International Accounting Standards Board (IASB or Board) issued the new standard, IFRS 18 Presentation and Disclosure in Financial Statements. The main amendments introduced by this Standard are: a) promotion of a more structured income statement. In particular, it introduces a new subtotal "operating profit" (as well as its definition) and the requirement that all income and expenses be classified into three new separate categories based on a company's main business activities: Operating, Investing and Financing. b) requirement for companies to analyse their operating expenses directly on the face of the income statement - either by nature, by function or in a mixed way. c) requirement for some of the "non-GAAP" measures that the Group uses to be reported in the financial statements. IFRS 18 defines management-defined performance measure (MPM or non-GAAP Performance Measures) as a subtotal of income and expenses that an Entity uses: - in public communications outside financial statements; and - to communicate management's view of the financial performance. For each MPM presented, companies will need to explain in a single note in the financial statements why the measure provides useful information, how it is calculated, and reconcile it with a value determined in accordance with IFRS. d) introduce improved guidance on how companies group information in financial statements. It includes guidance on whether material information is included in the primary financial statements or is more detailed in the notes. The amendments are effective for periods beginning on or after 1 January 2027 and apply retrospectively. Earlier application is permitted.	1 January 2027

	Amendment	Date of application
Standards and amendments not yet endorsed by the European Union		
IFRS 19 Presentation and Disclosure in Financial Statements	On 9 May 2024, the International Accounting Standards Board (IASB) issued the new Standard, IFRS 19 Subsidiaries without Public Accountability: Disclosures, which allows eligible subsidiaries to use IFRS with reduced disclosures. The application of IFRS 19 will reduce the costs of preparing the financial statements of subsidiaries, while maintaining the usefulness of the information for the users of their financial statements. A subsidiary may elect to apply the new Standard in its consolidated, individual or separate financial statements, provided that, at the reporting date: a) It has no public accountability; b) Its parent company prepares consolidated financial statements in accordance with IFRS. A subsidiary that applies IFRS 19 is required to state clearly in its explicit and unconditional statement of compliance with IFRS that IFRS 19 has been adopted. The amendments are effective for annual reporting periods beginning on or after 1 January 2027. The standard is applied retrospectively. Earlier application is permitted.	1 January 2027
Amendments relating to the translation of financial information from a non-hyperinflationary currency into a hyperinflationary currency	On 13 November 2025, the International Accounting Standards Board (IASB) issued amendments to IAS 21 – The Effects of Changes in Foreign Exchange Rates, which clarify how entities should translate financial statements from a non-hyperinflationary currency to a hyperinflationary currency. The amendments are effective for periods beginning on or after 1 January 2027. Earlier application is permitted.	1 January 2027

With respect to the above standards, which are not yet mandatory, the Group has not yet completed the calculation of all impacts arising from their application and has therefore elected to apply them early, although these impacts are not expected to be material.

1.5. Significant accounting estimates and judgements

The preparation of consolidated financial statements requires that the Group's Board of Directors make judgements and estimates that affect the amount of revenue, costs, assets, liabilities and disclosures at the date of the consolidated statement of financial position. To that effect, the Group's Board of Directors are based on:

i. the best information and knowledge of current events and in certain cases on the reports of independent experts, and

ii. the actions that the Group considers it may have to take in the future.

On the date on which the operations take place, the outcome could differ from those estimates. More significant estimates and judgements are presented below:

Significant accounting estimates and judgements	Notes
Recoverability of goodwill	3.1 – Goodwill
Fair value of brands, useful life and amortisation of other intangible assets	3.2 – Intangible assets
Recoverability, useful life and depreciation of property, plant and equipment	3.3 – Property, plant and equipment
Fair value of biological assets	3.8 – Biological assets
Uncertainty over Income Tax Treatments	6.1 - Income tax for the period
	6.2 - Deferred taxes
Actuarial assumptions	7.2 – Employee benefits
Recognition of provisions	10.1 - Provisions

2. Operational performance

2.1 Revenue and segment reporting

Accounting policies

Navigator Group business areas

The Navigator Group's main business is the production and sale of writing and printing thin paper (UWF) and domestic consumption paper (Tissue), and it is present in the whole value added chain, from research and development of forestry and agricultural production to the purchase and sale of wood and the production and sale of bleached eucalyptus kraft pulp – BEKP – and electric and thermal energy, as well as its commercialisation. In the last quarter of 2024, the group also started producing moulded fibre packaging at the Aveiro industrial complex. This new production facility is aimed at a market with high growth potential, fully aligned with the challenges of reducing the use of single-use plastics.

The Navigator Group currently has ten industrial sites – four in Portugal, one in Spain and five in the United Kingdom. Of the industrial complexes in Portugal, two are dedicated to the production of BEKP pulp, electricity and UWF paper (Figueira da Foz and Setúbal), one is dedicated to the production of BEKP pulp, energy, moulded cellulose packaging and tissue paper (Aveiro) and a fourth, in Vila Velha de Ródão, produces tissue. In Spain, the Group owns an industrial complex in Zaragoza where it produces tissue paper. In May 2024, following the acquisition of the Navigator Tissue UK Group (formerly the Accrol Group), the Navigator Group now has five production sites in the UK related to the tissue business: Blackburn (rolls and facials); Leicester (rolls); Leyland (rolls); Flint (wet wipes) and Bridgewater (wet wipes).

With the aim of strengthening its leading position in tissue paper production and ensuring greater operational resilience, the Navigator Group implemented in 2025 a strategic plan to consolidate its tissue roll operations (toilet and kitchen rolls) in the United Kingdom, which is expected to be completed in 2026.

This consolidation of the tissue roll operations in two strategic locations, Leyland and Leicester, will enable the optimisation of supply to the North and South of England, ensuring greater proximity to the main consumption centres and improved logistical coverage of the UK market. The new operating model combines manufacturing and storage capacity into a more agile and efficient system, designed to scale up operations, reduce fixed costs and improve the efficiency of the supply chain.

Wood is produced from woodlands owned or leased by the Group in Portugal and Spain and also from granted lands in Mozambique. The production of cork and pine wood are sold to third parties while the eucalyptus wood is mainly consumed in the production of BEKP.

A significant portion of the Group's own BEKP production is consumed in the production of UWF and tissue paper. Sales of BEKP and UEKP pulp, UWF paper and tissue paper are made to 112 (2024: 118) countries and territories worldwide.

About energy production, the Navigator Group operates three renewable cogeneration plants, integrated into its pulp production operations, generating steam and electricity, with the former consumed internally and the latter largely sold to the national power grid, although a portion is also used for self-consumption. The Group also operates two natural gas-fired cogeneration plants integrated into paper production, located in Figueira da Foz and Setúbal, as well

as two standalone plants in Aveiro and Setúbal fuelled by residual forest biomass, with the electricity produced being sold to the national power grid under contracts in force until 2034.

In addition, the Group currently operates nine photovoltaic plants for self-consumption: three in Setúbal—two within the industrial complex and one at Herdade de Espirra; two at the Figueira da Foz industrial complex; one at the Zaragoza industrial complex; one at Raiz (in Aveiro); and a further two plants at the Aveiro and Vila Velha de Ródão industrial complexes.

With the conclusion of the construction of new photovoltaic plants, on a self-consumption basis, at the industrial sites of Figueira da Foz, Aveiro and Vila Velha de Ródão, Navigator, with around 38 MW of installed photovoltaic solar energy capacity, has become the largest self-consumption producer in Portugal, in an industrial context.

Segment reporting

In accordance with IFRS 8, the Group considers an operating segment as a component of the group that develops business activities from which it can obtain revenue and incur expenses, whose operating profit or loss are regularly reviewed by the Executive Committee, which is primarily responsible for the Group's operational decision-making for allocation of resources to the segment and the assessment of its performance and for which separate financial information is available.

Each reportable segment corresponds to the value chain of the integrated production process associated with the product of each business segment, (Market Pulp, UWF paper, Tissue Paper and Energy) considering the sales activity of the respective products on the market, in a manner consistent with the information used by the Executive Committee for operational monitoring of its businesses.

Accordingly, intra-segmental sales are those that occur within the same manufacturing plant and whose production inputs are used in the production process of that segment. Thus, the values reported for each operating segment result from the aggregation of the business units and subsidiaries defined in the perimeter of each segment, as well as the cancellation of intra-segment transactions.

Intra-segmental sales correspond to sales between business segments, which are eliminated for consolidation purposes, and this effect is reported in Cancellations. When aggregating the Group's operating segments, Management defined as reportable segments those that correspond to each of the business areas developed by the Group, as follows:

i. Market pulp – bleached eucalyptus BEKP for sale in the market;

ii. UWF paper – production and sale of UWF uncoated writing and printing thin paper;

iii. Tissue Paper – production and sale of domestic consumption paper;

iv. Biomass renewable energy – which includes the cogeneration units and the two independent thermal power plants;

v. Support – segment that includes the corporate centre (mixed holding).

Regarding the allocation of assets and liabilities to business segments, it should be noted that:

- All equipment allocated to the UWF pulp and paper production are included in Property, plant and equipment of the respective segments.
- The Group's real estate assets are allocated to the respective business segment.
- The assets related to forests are allocated to the pulp and UWF paper segments, according to the production capacity of each segment.

- In accordance with the Navigator Company Group's financing policy, all loans are contracted by the Group's holding company, The Navigator Company, S.A., which is responsible for bearing all debt and related charges. Accordingly, interest-bearing liabilities (Note 5.7) are allocated to the "Support" segment, which includes the Group's corporate centre (Holding), with the exception of the repayable grant related to the construction of the new tissue mill, allocated to the "Tissue Paper" segment and a portion of the "Inpactus" grant allocated to the "UWF Paper" segment.

Revenue

Revenue is presented by operating segment and by geographic area, based on the country of destination of the goods and services sold by the Group.

Commercial contracts with Customers refer essentially to the sale of goods such as paper, pulp, tissue and energy, to the transportation inherent to those goods, when applicable.

Revenue recognition in each operating segment is described as follows:

Market pulp	Pulp revenue results from sales to international paper and decor producers. Revenue is recognised at a specific time, by the amount of the performance obligation satisfied, the price of the transaction corresponding to a fixed amount invoiced on the basis of quantities sold, less cash discounts and quantity discounts, which are reliably determinable. On the export side, the transfer of control of the products occurs in general when there is a transfer of control to the Customer, according to the Incoterms negotiated.
UWF	Paper revenue refers to sales made through Commercial Distributors (B2B), which include large distributors, wholesalers or commercial operators. Revenue is recognised at a specific time, on the date of delivery of the product to the customer when the transfer of control occurs, by the amount of the performance obligation satisfied, and the price of the transaction corresponds to a fixed amount invoiced according to the quantities sold, less cash discounts and quantity discounts, which are reliably determinable. On the export side, the transfer of control of the products occurs in general when there is a transfer of control to the Customer, according to the Incoterms negotiated.
Tissue	Tissue revenue results from sales of tissue paper produced for the private label of modern national and international retail chains. Revenue is recognised at a specific point in time—on the date the product is delivered to the customer, when control is transferred—in the amount of the performance obligation satisfied, provided that the transaction price corresponds to a fixed amount invoiced based on the quantities sold, net of cash discounts and volume discounts, which are determined reliably. On the export side, the transfer of control of the products occurs in general when there is a transfer of control to the Customer, according to the Incoterms negotiated
Energy	The revenue is generated from the sale of electricity to the national grid. In 2025, the sale of electricity from renewable cogeneration plants was marked by the commencement of a gradual transition from a full sale-to-the-grid regime to a self-consumption model, with the sale of surplus electricity under market-based arrangements. The Aveiro cogeneration plant, the TG3 cogeneration plant in Figueira da Foz and the Setúbal Renewable Paper Cogeneration Plant currently operate under a market-based surplus sales arrangement. The remaining renewable cogeneration plants and the biomass-fired power plants continue to sell their entire net output and benefit from regulated sales tariffs, in accordance with the current legal framework. In turn, the natural gas cogeneration plant in Setúbal is operating on a self-consumption basis, selling its surplus production at market prices.
Support	The revenue from the sale of other products such as waste, or services (brokerage, for example) is recognised on the date of delivery of the product to the Customer by the amount of the performance obligation satisfied. The income related to this segment is reclassified to other operating income or to less costs.

The Navigator Group considers the facts and circumstances when analysing the terms of each Customer contract and its usual business practices in determining the transaction price. In this sense, in terms of sales tax, from the assessment performed by Navigator, there are no situations that could be included in the transaction price. Regarding specifically to the anti-dumping tax, this is a tax for the entry of goods into the country (in the case of the USA) and is not a tax determined *a priori* but depends on the analysis of the Department of Commerce *a posteriori*. Similarly, the trade tariffs imposed by the US also constitute an import duty on goods entering the country. Accordingly, both anti-dumping duties and tariffs are treated as a reduction in the gross margin generated in the United States of America, rather than as an adjustment to the price of the individual transaction.

Financial information by operating segment in 2025 and 2024

Amounts in Euros	Market Pulp	UWF Paper	Tissue Paper	Energy	Support	* Cancellation	Total
							2025
REVENUE							
Sales and services - external	175,203,096	1,212,308,614	483,720,241	98,533,891	-	-	1,969,765,842
Sales and services - intersegment	5,697,114	-	-	45,124,648	-	(50,821,762)	-
Total Revenue	**180,900,210**	**1,212,308,614**	**483,720,241**	**143,658,539**	**-**	**(50,821,762)**	**1,969,765,842**
PROFIT/ (LOSS)							
Operating income (1)	**(16,994,601)**	**193,047,566**	**63,386,124**	**10,905,628**	**(42,614,862)**	**-**	**207,729,855**
Net financial results	-	-	-	-	(31,943,070)	-	(31,943,070)
Income tax	-	-	-	-	(31,093,828)	-	(31,093,828)
Net profit for the period							**144,692,957**
Non-controlling interests	-	-	-	-	(25,522)	-	(25,522)
Profit/ (loss) attributable to equity holders	**-**	**-**	**-**	**-**	**-**	**-**	**144,667,435**
OTHER INFORMATION							
Acquisitions of fixed capital	36,969,358	136,522,925	32,209,445	1,312,265	2,896,511	-	209,910,504
Depreciation (impairment included)	(20,928,384)	(95,101,191)	(35,056,551)	(19,373,786)	(1,066,799)	-	(171,526,711)
Provisions ((increases) / reversal)	96,022	(328,346)	(574,953)	-	4,370,933	-	3,563,656
OTHER INFORMATION							
SEGMENT ASSETS							
Goodwill	-	376,756,383	43,824,286	-	-	-	420,580,669
Property, plant and equipment	158,752,657	857,631,089	322,233,779	117,648,390	6,233,588	-	1,462,499,503
Right-of-use assets	14,248,736	51,063,454	53,772,317	-	983,670	-	120,068,177
Biological assets	30,161,661	90,484,982	-	-	-	-	120,646,643
Non-current receivables	-	1,796,555	45,027	-	133,805	-	1,975,387
Inventories	26,708,146	210,204,080	66,445,019	853,564	2,074,733	-	306,285,542
Trade receivables	28,306,333	178,207,531	79,275,843	1,138,871	5,713,401	-	292,641,979
Other current receivables	14,739,916	53,055,383	11,845,145	912,015	47,104,371	-	127,656,830
Other assets	8,480,463	62,225,868	96,212,444	-	169,249,847	-	336,168,622
Total Assets	**281,397,912**	**1,881,425,325**	**673,653,860**	**120,552,840**	**231,493,415**	**-**	**3,188,523,352**
SEGMENT LIABILITIES							
Interest-bearing liabilities	-	360,286	33,584,551	-	799,913,502	-	833,858,339
Lease liabilities	15,809,531	56,099,625	59,566,221	-	1,054,291	-	132,529,668
Other current payables	38,300,717	254,842,615	62,012,492	7,425,021	172,948,697	-	535,529,542
Other liabilities	28,244,191	118,834,583	70,262,816	6,436,578	49,698,760	-	273,476,928
Total Liabilities	**82,354,439**	**430,137,109**	**225,426,080**	**13,861,599**	**1,023,615,250**	**-**	**1,775,394,477**

* Cancellation of intersegment operations. Consolidation adjustments related to intersegment transactions are considered not significant.

(1) Includes the effects of hedging derivatives of Euro (246,790) in the Pulp segment and of Euro 15,338,071 in the UWF Paper segment.

In 2025, The Navigator Company recorded a turnover of Euro 1,969,765,842, with paper sales, including packaging, accounting for approximately 62% of turnover (vs. 61%), pulp sales 9% (vs. 11%), tissue sales 25% (vs. 22%) and energy sales 5% (vs. 6%).

In 2025, the global economy faced a highly uncertain environment, marked by an increase in US trade tariffs, persistent geopolitical tensions and a reshaping of international relations.

The Pulp and Paper sector came under significant pressure, evidenced by a sharp decline in pulp prices in China after April, with repercussions in Europe. Against a backdrop of widespread price declines, Navigator continued to maintain a solid market position. Its broad international presence and business diversification strategy enabled the Group to seize opportunities, grow volumes and gain market share.

Portfolio transformation now stands out as an effective driver of resilience, already reflected in the sales mix. Tissue is a clear example of this trend, having increased from approximately 5% to about a quarter of total revenue over the course of a decade, driven by acquisitions and organic growth. Concurrently, the packaging business line, developed entirely in-house, accounted for more than 4% of sales in 2025, recording growth of 8% compared to 2024. This performance was underpinned by an 11% increase in volume, measured in tonnes, alongside a 17% increase in the paper area sold, driven by greater penetration in low-grammage segments.

Vertical integration, combined with the efficiency and flexibility of its business model, provides Navigator with competitive edge and paves the way for alternative growth strategies. Business diversification and innovation in new products remain key strategic pillars, complementing the commercial strategy and geographical expansion.

Total energy sales amounted to Euro 98,533,891 compared to Euro 122,788,834 in 2024, a decrease of approximately 20%. This reduction was primarily due to the following factors: (i) the transition, from May onwards, of the Aveiro renewable cogeneration facilities and one turbo-generator in Figueira da Foz to a self-consumption regime, together with a turbo-generator in Setúbal in November, following the termination of the special remuneration scheme; and (ii) the shutdown of the Aveiro Biomass Power Plant for maintenance.

Energy sales are broken down by type of plant as follows:

	2025		2024	
	Mwh	**Amount**	**Mwh**	**Amount**
Biomass Power Plants	114,771	15,959,212	179,525	24,714,238
Renewable Cogeneration Plants - Pulp	730,453	78,380,215	852,396	92,797,452
Non-Renewable Cogeneration Plant - Paper	101,609	4,188,188	106,327	4,669,926
Derivatives, Guarantees of Origin and other	-	6,276	-	607,218
	946,833	**98,533,891**	**1,138,248**	**122,788,834**

The Group's industrial facilities continued to actively provide the Frequency Restoration Reserve Band Market service, with manual activation (mFRR Band). This system service (provided to the electricity transmission system operator by duly qualified agents) is intended to contribute to safeguarding the security of supply of the National Electricity System and has already proven to be essential in protecting household consumers and critical users.

The fixed capital expenditure in 2025 stood at Euro 209,910,504, compared with Euro 240,628,520 in the previous year. This amount mainly includes investments aimed at decarbonisation, maintaining production capacity, modernising equipment and improving efficiency, as well as structural and safety projects, of which approximately 60% (2024: 50%) are sustainable-driven investments.

Key investments include the new high-tech Chemical Recovery Boiler at the Setúbal industrial complex, which is already in operation. In addition to the clear improvement in operational performance, this investment is also expected to deliver positive

environmental outcomes, notably through the reduction of odorous gas emissions, which will be incinerated in this equipment. Also noteworthy is the Oxygen Delignification Line at Setúbal, scheduled to start up in April 2026, which will enable a reduction in chemical consumption during the pulp bleaching stage, while also improving the quality of effluents from that industrial facility.

The implementation of all projects under the Recovery and Resilience Plan (RRP) is proceeding as planned and in accordance with the commitments undertaken with the national authorities.

							2024
Amounts in Euros	Market Pulp	UWF Paper	Tissue Paper	Energy	Support	* Cancellation	Total
REVENUE							
Sales and services - external	237,730,013	1,271,500,425	456,257,281	122,788,834	-	-	2,088,276,553
Sales and services - intersegment	2,831,203	-	-	46,217,863	-	(49,049,066)	-
Total revenue	**240,561,216**	**1,271,500,425**	**456,257,281**	**169,006,697**	**-**	**(49,049,066)**	**2,088,276,553**
PROFIT/ (LOSS)							
Operating income (1)	**31,891,469**	**303,861,737**	**76,451,601**	**22,129,153**	**(55,464,164)**	**-**	**378,869,796**
Net financial results	-	-	-	-	(25,839,567)	-	(25,839,567)
Income tax	-	-	-	-	(66,046,016)	-	(66,046,016)
Net profit for the period							286,984,213
Non-controlling interests	-	-	-	-	(36,018)	-	(36,018)
Profit/ (loss) attributable to equity holders	**-**	**-**	**-**	**-**	**-**	**-**	**286,948,195**
OTHER INFORMATION							
Acquisitions of fixed capital	32,565,167	177,743,951	22,413,518	2,764,530	5,141,354	-	240,628,520
Depreciation (impairment included)	(17,791,078)	(92,148,909)	(31,386,430)	(19,074,713)	(7,459,334)	-	(167,860,464)
Provisions ((increases) / reversal)	-	276,870	12,500	-	(321,548)	-	(32,178)
OTHER INFORMATION							
SEGMENT ASSETS							
Goodwill	-	376,756,383	45,870,954	-	-	-	422,627,337
Property, plant and equipment	151,004,952	808,310,338	320,668,615	129,491,427	6,469,753	-	1,415,945,085
Right-of-use assets	14,003,867	52,461,957	30,557,574	-	1,627,768	-	98,651,166
Biological assets	28,812,550	86,437,648	-	-	-	-	115,250,198
Non-current receivables	-	4,696,897	8,136,600	-	309,440	-	13,142,937
Inventories	19,393,981	217,527,247	63,786,298	927,446	1,563,395	-	303,198,367
Trade receivables	39,090,634	155,681,370	102,019,064	744,650	7,506,779	-	305,042,497
Other current receivables	18,865,900	66,902,642	18,614,765	1,159,038	86,113,779	-	191,656,124
Other assets	8,892,098	70,163,195	97,428,633	6,015	311,179,412	-	487,669,353
Total Assets	**280,063,982**	**1,838,937,677**	**687,082,503**	**132,328,576**	**414,770,326**	**-**	**3,353,183,064**
SEGMENT LIABILITIES							
Interest-bearing liabilities	-	415,573	48,532,818	-	855,029,361	-	903,977,752
Lease liabilities	15,411,571	57,006,275	37,587,262	-	1,731,792	-	111,736,900
Other current payables	42,756,779	264,028,115	59,464,303	4,137,851	288,182,626	-	658,569,674
Other liabilities	30,381,754	141,657,502	72,132,454	7,026,567	71,611,277	-	322,809,554
Total Liabilities	**88,550,104**	**463,107,465**	**217,716,837**	**11,164,418**	**1,216,555,056**	**-**	**1,997,093,880**

* Cancellation of intersegment operations. Consolidation adjustments related to intersegment transactions are considered not significant.

(1) Includes the effect of hedging derivatives of Euro 1,018,419 in the Pulp segment and Euro 4,695,937 in the UWF Paper segment.

Revenue by business segment, by geographic area and by recognition pattern

2025

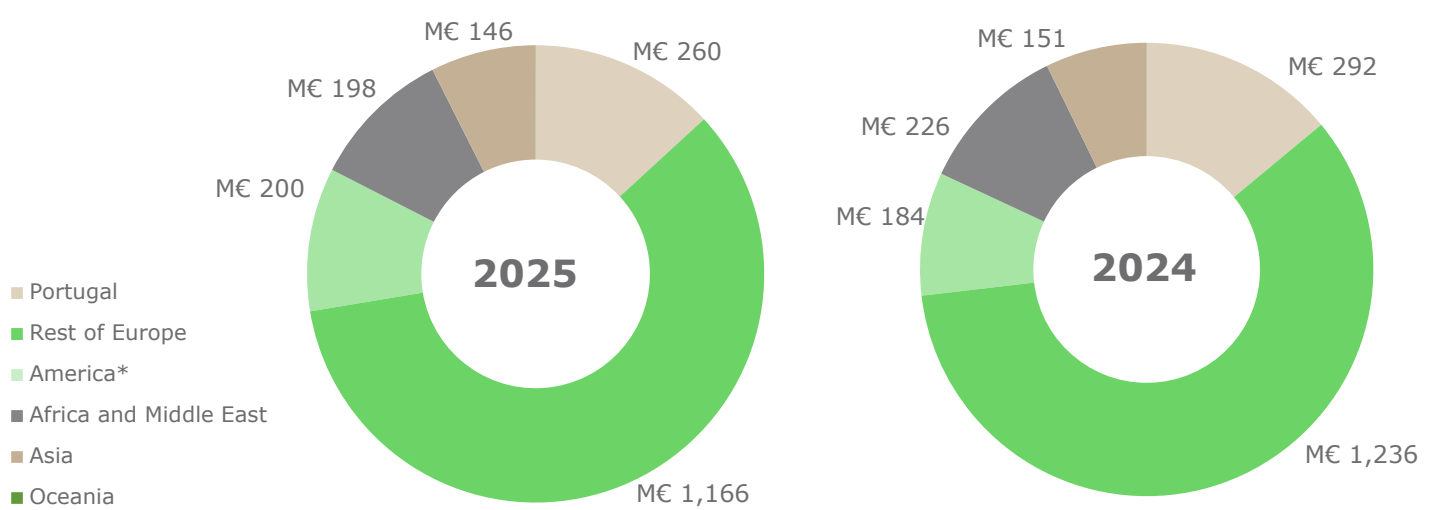
Amounts in Euros	Pulp	UWF Paper	Tissue Paper	Energy	Total Amount	Total %
Portugal	8,167,214	62,194,905	90,653,908	98,531,591	259,547,618	13.18%
Rest of Europe	110,493,427	666,800,331	388,781,068	2,300	1,166,077,126	59.20%
America*	330,828	198,301,618	1,250,717	-	199,883,163	10.15%
Africa and Middle East	25,964,096	168,582,578	3,034,548	-	197,581,222	10.03%
Asia	30,039,438	116,261,223	-	-	146,300,661	7.43%
Oceania	208,093	167,959	-	-	376,052	0.02%
	175,203,096	**1,212,308,614**	**483,720,241**	**98,533,891**	**1,969,765,842**	**100.00%**
Recognition pattern						
At a certain moment in time	175,203,096	1,212,308,614	483,720,241	98,533,891	1,969,765,842	100.00%
Over time	-	-	-	-	-	0.00%

* Includes North America and Latin America

2024

Amounts in Euros	Pulp	UWF Paper	Tissue Paper	Energy	Total Amount	Total %
Portugal	11,344,979	66,027,268	91,859,908	122,784,554	292,016,709	13.98%
Rest of Europe	139,131,658	735,280,377	361,125,414	4,280	1,235,541,729	59.17%
America*	6,295,801	175,856,336	1,467,789	-	183,619,926	8.79%
Africa and Middle East	40,021,254	183,976,854	1,804,170	-	225,802,278	10.81%
Asia	40,936,321	110,106,670	-	-	151,042,991	7.23%
Oceania	-	252,920	-	-	252,920	0.01%
	237,730,013	**1,271,500,425**	**456,257,281**	**122,788,834**	**2,088,276,553**	**100.00**
Recognition pattern						
At a certain moment in time	237,730,013	1,271,500,425	456,257,281	122,788,834	**2,088,276,553**	100.00%
Over time	-	-	-	-	-	0.00%

Group's revenue distribution by geographic area



In 2025 and 2024, no single Customer accounted for 10% or more of the Group's total revenues.

2.2. Other operating income

For the periods ended 31 December 2025 and 2024, Other operating income is detailed as follows:

Amounts in Euros	2025	2024
Gains on disposal of non-current assets	108,162	178,066
Grants - CO_2 emission allowances	29,276,918	35,508,908
Supplementary gains	1,379,573	1,298,108
Operating grants	25,448,344	14,005,693
Impairment reversal on receivables (Note 8.1.4)	492,685	4,105,821
Impairment reversal on inventories (Note 4.1.4)	8,166,835	5,068,999
Gains on inventories (Notes 4.1.2 and 4.1.3)	704,527	755,198
Own work capitalised	4,032,278	7,533,597
Compensations	868,199	638,497
Waste sales	12,197,622	15,208,232
Other operating income	7,767,250	16,492,358
	90,442,393	**100,793,477**

Gains on CO_2 emission allowances correspond to the recognition of free allocation of allowances for 397,029 tonnes of CO_2, at a price of Euro 73.74/t (480,955 tonnes of CO_2, at a price of Euro 73.83 in 2024) (Note 3.2).

Operating grants include Euro 20,607,606 (Euro 9,736,412 in 2024) related to the indirect cost aid measure for facilities covered by the European Emissions Trading Scheme (EU ETS), under Decree-Law 12/2020 of 6 April, as well as the incentive related to the Recovery and Resilience Plan (RRP) of Euro 4,194,152 (Euro 3,017,300 in 2024). This caption also includes grants awarded for research and development projects carried out by the RAIZ institute.

The increase in Impairment reversal on inventories mainly relates to the impairment reversal for waste, resulting from the change in the reintegration mix during the year.

Accounting policies

Government grants

Operating grants

Government grants are only recognised when there is a reasonable assurance that the grant will be received, and the Group will comply with all required conditions. Operating grants, received with the purpose of compensating the Group for costs incurred, are systematically recorded in the income statement during the periods in which the costs that those grants are intended to compensate are recorded.

Grants related to biological assets

Grants related to biological assets (Note 3.8) carried at fair value, in accordance with IAS 41, are recognised in the income statement when the terms and conditions of the grant are met.

Grants – CO_2 Emission allowances

Grants related to CO_2 emission allowances (Note 3.2) are recognised as deferred income and are systematically recorded in the income statement during the periods in which the expenses that those grants are intended to compensate are recorded.

2.3. Other operating expenses

For the periods ended 31 December 2025 and 2024, Other operating expenses is detailed as follows:

Amounts in Euros	2025	2024
Cost of goods sold and materials consumed (Note 4.1.2)	**863,635,390**	**880,548,487**
External services and supplies		
Energy and fluids	148,746,922	138,428,891
Transportation of goods	158,156,889	152,884,413
Specialised work	103,347,805	100,751,347
Maintenance and repair	48,441,022	40,758,036
Rentals	9,867,087	8,688,495
Advertising and marketing	11,584,280	11,835,995
Insurance	12,347,378	13,322,369
Travel and accommodation	5,375,705	5,134,588
Fees	4,521,731	6,539,574
Subcontracts	3,692,288	2,723,064
Materials	4,552,779	4,161,889
Communications	1,492,801	1,409,739
Other	14,544,632	14,228,821
	526,671,319	500,867,221
Changes in production (Note 4.1.3)	**29,680,821**	**3,499,808**
Payroll costs (Note 7.1)	**217,701,470**	**203,780,154**
Other operating expenses		
Costs with CO_2 emission allowances	35,258,749	33,434,013
Impairment on receivables (Note 8.1.4)	105,237	340,564
Impairment on inventories (Note 4.1.4)	2,291,493	3,165,457
Other inventory losses (Notes 4.1.2 and 4.1.3)	3,941,943	4,491,888
Indirect taxes	5,921,469	4,594,801
Water resources fee	2,037,198	2,076,795
Other operating expenses	4,863,238	4,492,152
	54,419,327	**52,595,670**
Net provisions (Note 10.1)	**(3,563,656)**	**32,178**
Total operating expenses	**1,692,108,327**	**1,641,291,340**

The increase in Energy and fluid costs is primarily due to significant fluctuations in electricity and natural gas prices, particularly natural gas, with prices ranging from Euro 48/MWh in the first quarter to Euro 32/MWh in the fourth quarter of the year. Compared to 2024, the TTF index, which serves as a benchmark for the European natural gas market, recorded an increase of approximately 12%, whilst the spot price of electricity in the Iberian market (OMIE) rose by around 5%. During the year, price spikes were also recorded, reaching Euro 143/MWh for electricity and Euro 58/MWh for natural gas.

On the other hand, the increase recorded under Transportation of goods is mainly attributable to the inclusion in 2025 of twelve months of activity from the Navigator Tissue UK Group, whereas only eight months of activity were included in 2024 (following the acquisition of this Group in May 2024). Additionally, an increase of Euro 1,766,411 was recorded in forest freight transportation costs, representing a rise of approximately 22% compared to 2024.

In 2025 and 2024, external services and supplies costs incurred for investigation and research activities amounted to Euro 5,297,493 and Euro 5,349,558, respectively. The Group plans to apply for SIFIDE approximately Euro 12 million (Euro 11 million in 2024) relating to research and development expenditure (which also includes eligible payroll costs). These expenses will allow the Group to benefit from incentives of approximately Euro 4.1 million (2024: Euro 3.9 million) if the eligibility criteria required by the application are met.

The expenses with CO_2 correspond to the emission of 485,054 tonnes of CO_2[67](31 December 2024: 466,992 tonnes), achieving a 32.4% reduction in CO_2 emissions compared to 2020, the base year used for the validation of the targets by the Science Based Targets Initiative (485,054 tonnes vs. 717,121 tonnes of CO_2 in 2020). The increase in expenditure compared with the same period last year is mainly due to a 3.9% rise in the consumption of allocated allowances, whilst the price remained virtually unchanged year-on-year (Euro 73.74/t in 2025 vs. Euro 73.83/t in 2024).

In 2025, Impairment on inventories mainly includes the recognition of an amount of Euro 1,032,506 relating to moulded pulp inventory and Euro 557,352 relating to spare parts. In 2024, Impairment on inventories essentially includes the recognition of Euro 1,724,970 relating to impairment for UWF and tissue paper waste and Euro 1,248,818 for slow movers.

Audit fees

	2025		2024	
Amounts in Euros	KPMG & Associados SROC	Other entities belonging to the same network	KPMG & Associados SROC	Other entities belonging to the same network
The Navigator Company, S.A.				
Audit fees	552,226	-	252,500	-
Other assurance services	83,750	-	116,500	-
Other services	-	-	3,500	328,278
	635,976	**-**	**372,500**	**328,278**
To entities belonging to Navigator Group				
Audit fees	107,626	17,326	215,353	33,117
Other assurance services	40,000	-	51,850	-
Other services	11,000	96,172	-	-
	158,626	**113,498**	**267,203**	**33,117**
	794,602	**113,498**	**639,703**	**361,395**

In 2025, the services other than auditing services invoiced to the company or to entities in a parent-subsidiary relationship with it by the External Auditor and Statutory Auditor, including entities in a holding relationship with it or that are part of the same network, represented 25.4% (2024: 50.0%) of the total services rendered.

	2025		2024	
Amounts in Euros	Expenses for the period	Fees invoiced	Expenses for the period	Fees invoiced
KPMG (SROC) and other entities belonging to the same network				
Audit fees	572,708	677,178	643,224	500,970
Other assurance services	67,000	123,750	113,900	168,350
Other services	107,172	107,172	331,778	331,778
	746,880	**908,100**	**1,088,902**	**1,001,098**

The services referred to as Other assurance services relate to the issuance of reports on financial information and to verification services of Sustainability Information. With regard to Other services other than auditing, these comprise opinions on merger transactions performed in the context of the duties of the Sole Statutory Auditor of companies within the Navigator Group, as well as agreed-upon procedures services on financial information.

The Board of Directors considers that sufficient safeguards are in place to ensure the independence of the auditors, through the approval processes of the Supervisory Board, the nature of the proposed engagements and their careful definition at the contracting stage.

[67] CO_2 emissions from assets in factories, Scope 1 - EU ETS basis.

3. Investments

3.1. Goodwill

Goodwill – net amount

Goodwill is attributed to the Group's cash generating units (CGU's), as follows:

Amounts in Euros	2025	2024
CGU of UWF paper production on Figueira da Foz site (goodwill resulting from the acquisition of Navigator Brands, S.A.)	376,756,383	376,756,383
CGU of Tissue paper production on Vila Velha de Ródão site (goodwill resulting from the acquisition of Navigator Tissue Ródão, S.A.)	583,083	583,083
CGU of the production and sale of Tissue paper in Ejea and France (goodwill resulting from the acquisition of Navigator Tissue Ejea, SL. and Navigator Tissue France, EURL)	4,156,542	4,156,542
CGU of the production and sale of Tissue paper in the United Kingdom (initial goodwill resulting from the acquisition of the Accrol Holdings Plc Group)	39,084,661	41,131,329
	420,580,669	**422,627,337**

Navigator España, S.A. / Navigator Paper Figueira, S.A.

Following the acquisition of 100% of the former Soporcel – Sociedade Portuguesa de Papel, S.A. (currently Navigator Brands, S.A.), for Euro 1,154,842,000, Goodwill amounting to Euro 428,132,254 was determined.

For the purposes of goodwill allocation, goodwill is deemed to be allocated to the cash-generating unit relating to the integrated paper production at the Figueira da Foz industrial complex.

This goodwill has a carrying amount of Euro 376,756,383, as it was subject to annual amortisation up to 31 December 2003 (date of transition to IFRS: 1 January 2004), with amortisation ceasing from that date, at which time the accumulated amortisation amounted to Euro 51,375,871. From that date on, depreciation ceased and was replaced by annual impairment tests. Had this amortisation not been suspended, the net book value of the Goodwill as at 31 December 2025 would have been nil (31 December 2024: Euro 17,125,290).

Navigator Tissue Ródão, S.A.

On 6 February 2015, the contracts for the acquisition of AMS-BR Star Paper, S.A. were concluded. (later merged into Navigator Tissue Ródão, S.A.) were concluded, with the authorisation to conclude this transaction being formalised on 17 April 2015.

To the initial acquisition difference, of Euro 21,337,916, was deducted the AICEP's investment grant and the fair value of the acquired property, plant and equipment, with a goodwill amounting to Euro 583,083.

Navigator Tissue Ejea, S.L.U.

On 31 March 2023, the Navigator Group acquired all the shares representing the share capital of Gomà-Camps Consumer, S.L.U., based in Zaragoza, Spain, which in turn holds the entire share capital of Gomà-Camps France SAS, based in Castres, France.

These companies have been renamed Navigator Tissue Ejea, S.L.U. and Navigator Tissue France SAS, respectively.

The Enterprise Value of this acquisition amounted to Euro 60,951,811 and was realised entirely in cash and cash equivalents, with no contingent consideration associated with this acquisition.

The initial acquisition difference of Euro 34,037,142 was deducted from the fair value attributed to property, plant and equipment and intangible assets acquired in the amount of Euro 38,240,800 and Euro 1,600,000, respectively, as well as the associated deferred tax liabilities, resulting in final goodwill of Euro 4,156,542 (Note 1.2).

Navigator Tissue UK

On 24 May 2024, the Navigator Group concluded a public takeover bid, in the form of a "Recommended Firm Cash Offer", for the entire share capital of Accrol Group Holdings Plc (Accrol), currently Navigator Tissue Uk Group, a company based in Blackburn, England, which holds 7 subsidiaries, 5 of which operational.

Accrol Group is a leader in the Tissue Paper converting segment in the United Kingdom, producing private label toilet rolls, kitchen rolls and facial tissues for most of the main retailers in the UK.

In connection with this acquisition, the consideration paid amounted to Euro 153,765,152 (GBP 130,823,390), representing a net outlay for the Navigator Group of Euro 150,779,060, taking into account the cash and cash equivalents acquired in the amount of Euro 2,986,092.

The transaction resulted in initial goodwill of Euro 114,920,802 (GBP 97,774,618), from which the fair value attributed to tangible and intangible fixed assets in the amount of Euro 25,734,059 and Euro 74,045,509, respectively, as well as the associated deferred tax liabilities, were deducted. The final goodwill amounted to Euro 40,086,125 (GBP 34,105,275), which, as at 31 December 2025, corresponded to Euro 39,084,661 (Euro 41,131,329 in 2024), reflecting the impact of the foreign exchange adjustment at a rate of 0.8726.

Goodwill recoverability analysis

Every year, the Navigator Group calculates the recoverable amount of each business, based on value-in-use calculations, in accordance with the Discounted Cash Flow method. The projections are based on historical performance and expectations regarding business development under the current production structure, using approved budgets and estimated cash flows for an explicit period considered appropriate to the characteristics of the business and its degree of maturity. As a result of the calculations, up to this date no impairment losses relating to Goodwill have been identified.

The main assumptions for the above-mentioned calculation were as follows:

Assumptions on the basis of the business plan

Assumptions	2025 (CAGR 2026-2030)	2024 (CAGR 2025-2029)
Amount of sales (kt)		
Reference	UWF Paper	UWF Paper
CAGR Amount of sales (kt)	2.2%	0.8%
Reference	Tissue Paper Portugal	Tissue Paper Portugal
CAGR Amount of sales (kt)	2.2%	0.6%
Reference	Tissue Paper United Kingdom	Tissue Paper United Kingdom
CAGR Amount of sales (kt)	6.9%	-
Average price of sale ML/t		
Reference	UWF Paper	UWF Paper
CAGR Average price of sale ML/t	(0.1%)	0.0%
Reference	Tissue Paper	Tissue Paper
CAGR Average price of sale ML/t	(1.3%)	(0.5%)
Reference	Tissue Paper United Kingdom	Tissue Paper United Kingdom
CAGR Average price of sale ML/t	1.1%	-
Perpetuity growth rate – UWF Paper	(1.0%)	(1.0%)
Perpetuity growth rate – Tissue Paper - Portugal	1.9%	2.0%
Perpetuity growth rate – Tissue Paper - United Kingdom	2.0%	-

Macroeconomic assumptions

The main assumptions considered at the macroeconomic level are forecasts of GDP growth rate and inflation in Portugal. The sources of forecasts are the IMF and Banco de Portugal.

				2025
Macroeconomic assumptions	**2026**	**2027**	**2028**	**2029**
Real GDP growth rate	2.20%	1.70%	1.70%	1.70%
Inflation EUR	1.80%	1.90%	2.10%	2.00%

				2024
Macroeconomic assumptions	**2025**	**2026**	**2027**	**2028**
Real GDP growth rate	2.10%	2.20%	1.90%	1.90%
Inflation EUR	2.10%	2.00%	2.00%	2.00%

The perpetuity growth rate reflects the Boards of Directors' vision of the medium and long term for the different Cash Generating Units (CGUs), bearing in mind the macroeconomic assumptions.

Financial assumptions

Financial assumptions	2025 Risk-free interest rate*	2025 WACC rate EUR	2025 Perpetuity growth rate EUR	2025 Tax rate	2024 Risk-free interest rate*	2024 WACC rate EUR	2024 Perpetuity growth rate EUR	2024 Tax rate
UWF Paper								
Explicit Planning Period	2.70%	6.77%	-	26.50%	2.73%	6.00%	-	27.50%
Perpetuity	2.70%	6.77%	1.0%	26.50%	2.73%	6.00%	(1.0%)	27.50%
Tissue Paper - Ejea								
Explicit Planning Period	2.70%	6.89%	-	25.00%	2.73%	7.35%	-	25.00%
Perpetuity	2.70%	6.89%	1.9%	25.00%	2.73%	7.35%	2.0%	25.00%
Tissue Paper - UK								
Explicit Planning Period	5.11%	8.00%	-	25.00%	4.80%	10.00%	-	25.00%
Perpetuity	5.11%	8.00%	2.0%	25.00%	4.80%	11.00%	2.0%	25.00%

** Includes Country Risk Premium*

Estimates and judgements

Recoverability of Goodwill

The Group tests Goodwill impairment annually, recorded in its Statement of Financial Position. For impairment tests of CGUs, the recoverable amount was determined based on the value in use, according to the discounted cash flow method. The recoverable amount of CGUs derives from assumptions related to the activity, namely, sales volumes, average sales prices and variable costs that in the projection periods result from a combination of economic forecasts for the regions and markets where the Group operates, industry forecasts, including changes in markets derived from changes in installed capacity for each operating activity, internal management projections and historical performance. These calculations require the use of estimates. The impact of climate change has also been considered in the estimates of future cash flows, although the impact is not material. The risks and opportunities related to climate change identified in accordance with the TCFD recommendations are disclosed in the notes to the Management Report.

Sensitivity analysis

As at 31 December 2025, a possible increase of 0.5% in the discount rate used in the impairment test of Goodwill allocated to the cash-generating unit in Figueira da Foz integrated Paper, would imply a decrease in the assessment in the amount of Euro 215,929,016 (31 December 2024: Euro 273,710,850), which is still approximately 4 times higher than the book value of this cash-generating unit.

Moreover, the 0.5% increase in the discount rate used in the impairment test for Navigator Tissue Ejea would result, as at 31 December 2025, in a decrease in the valuation of Euro 27,944,625 (31 December 2024: Euro 15,985,812), which is still around 2.5 times higher than the book value of this cash-generating unit.

Finally, the 0.5% increase in the discount rate used in the impairment test for Navigator Tissue UK Group would result, as at 31 December 2025, in a decrease in the valuation of Euro 21,837,039, which is still higher than the book value of this cash-generating unit.

With regard to the Goodwill allocated to Navigator Tissue Ródão, given the immateriality of its value, any impacts would not be materially relevant.

Accounting policies

(i) Goodwill

Goodwill represents the difference between the fair value of the cost of acquisition and the fair value of the identifiable assets, liabilities and contingent liabilities of the subsidiaries included in the consolidation on the acquisition date and is allocated to each CGU or to the lower group of CGUs to which it belongs.

Amortisation and impairment

Goodwill is not amortised. The Group carries out annual impairment tests on goodwill, or where there are signs of impairment. The recoverable amounts of cash-generating units are determined as the higher of value in use and fair value less cost of sale. Impairment losses on goodwill cannot be reversed.

Disposal and loss of control

Gains or losses arising from the sale or loss of control over an entity or business to which Goodwill is allocated include the amount of the corresponding goodwill.

Tax deductibility

Derived from the current tax legislation in Portugal, it is not expected that Goodwill generated or to be recognised will be tax deductible.

3.2. Intangible assets

Movements in intangible assets

Amounts in Euros	Industrial property and other rights	CO_2 emission allowances	Other intangible assets	Intangible assets in progress	Total
Gross amount					
Balance as at 1 January 2024	**2,719,219**	**41,502,209**	**3,346,282**	**-**	**47,567,710**
Change in the perimeter	28,471,792	-	53,596,615	509,174	82,577,581
Allocations	-	35,508,908	-	-	35,508,908
Acquisitions		-	-	391,306	391,306
Adjustments, transfers and write-offs	(39,267)	(38,532,530)	-	-	(38,571,797)
Exchange rate adjustment	741,770	-	1,397,476	18,234	2,157,480
Balance as at 31 December 2024	**31,893,514**	**38,478,587**	**58,340,373**	**918,714**	**129,631,188**
Allocations	-	29,276,918	-	-	29,276,918
Acquisitions		-	-	568,564	568,564
Adjustments, transfers and write-offs	1,336,119	(33,920,144)	-	(908,671)	(33,492,696)
Exchange rate adjustment	(1,466,407)	-	(2,736,470)	(27,611)	(4,230,488)
Balance as at 31 December 2025	**31,763,226**	**33,835,361**	**55,603,903**	**550,996**	**121,753,486**
Accumulated amortisation and impairment losses					
Balance as at 1 January 2024	**(27,953)**	**-**	**(1,341,517)**	**-**	**(1,369,470)**
Change in the perimeter	(4,315,193)	-	-	-	(4,315,193)
Amortisation for the period (Note 3.7)	(1,543,687)	-	(2,500,420)	-	(4,044,107)
Impairment losses for the period (Note 3.6)	-	(145,674)	-	-	(145,674)
Adjustments, transfers and write-offs	13,089	-	-	-	13,089
Exchange rate adjustment	(138,373)	-	(30,773)	-	(169,146)
Balance as at 31 December 2024	**(6,012,117)**	**(145,674)**	**(3,872,710)**	**-**	**(10,030,501)**
Amortisation for the period (Note 3.7)	(1,548,211)	-	(3,158,458)	-	(4,706,669)
Impairment losses for the period (Note 3.6)	-	145,674	-	-	145,674
Adjustments, transfers and write-offs	337	-	246,304	-	246,641
Exchange rate adjustment	321,313	-	(92,105)	-	229,208
Balance as at 31 December 2025	**(7,238,678)**	**-**	**(6,876,969)**	**-**	**(14,115,647)**
Balance as at 1 January 2024	**2,691,266**	**41,502,209**	**2,004,765**	**-**	**46,198,240**
Balance as at 31 December 2024	**25,881,397**	**38,332,913**	**54,467,663**	**918,714**	**119,600,687**
Balance as at 31 December 2025	**24,524,548**	**33,835,361**	**48,726,934**	**550,996**	**107,637,839**

The increase recorded, as at 31 December 2024, under intellectual property and other rights, as well as other intangible assets, corresponds to the fair value attributed to brands and the customer portfolio as part of the acquisition of the Navigator Tissue UK Group.

CO_2 allowances

	31/12/2025	31/12/2024
CO_2 emission allowances (units)	458,778	516,373
Average unit value (Euro)	73.75	74.52
Market quotation (Euro)	85.73	71.57

CO_2 allowances – movements in the period

	2025		2024	
Amounts in Euros	**Tonnes**	**Amount**	**Tonnes**	**Amount**
Opening balance	**516,373**	**38,478,587**	**494,850**	**41,502,209**
CO_2 allowances awarded free of charge (Note 2.2)	397,029	29,276,918	480,955	35,508,908
Licences returned to the Licensing Coordination Entity	(454,624)	(33,920,144)	(459,432)	(38,532,530)
Closing balance	**458,778**	**33,835,361**	**516,373**	**38,478,587**

Accounting policies

Intangible assets are recorded at acquisition cost less depreciation and impairment losses.

The Group carries out impairment tests whenever events or circumstances may indicate that the book value of an asset exceeds its recoverable amount, being any impairment recognised in the income statement.

CO_2 Emission Rights

CO_2 emission Allowances attributed to the Group within the European Union Emissions Trading Scheme (EU ETS) for the assignment of CO_2 emission allowances at no cost, gives rise to an intangible asset for the allowances, a Government grant and a liability for the obligation to deliver allowances equal to the emissions that have been made during the compliance period.

Emission allowances are only recorded as intangible assets when the Group is able to exercise control and are measured at fair value (level 1) at the date of initial recognition. When the market value of the emission allowances falls significantly below its book value and such decrease is considered permanent, an impairment charge is booked for allowances which the group will not use internally.

The liability to deliver allowances is recognised based on actual emissions. This liability will be settled using allowances on hand, measured at the book value of those allowances. Any additional emissions are valued at market value as at the reporting date. FIFO is used in the costing of intangible asset decreases by the refund to the Licensing Coordinating Entity.

In the Consolidated Income Statement, the Group expenses, under Other costs and losses, actual emissions at fair value at the grant date, except for acquired allowances, where the expense is measured at their purchase price.

Such costs will offset other operating income resulting from the recognition of the original Government grant (also recognised at fair value at grant date) as well as any disposal of excess allowances.

The effect on the Income Statement will, therefore, be neutral regarding the consumption of granted allowances. Any net effect on the Income Statement will result from the purchase of additional allowances to cover excess emissions, from the sale of effective consumption or from impairment losses booked to allowances that are not used at operational level.

Brands

Whenever brands are identified in a business combination, the Group records them separately in the consolidated financial statements as an asset at cost, which represents their fair value on the acquisition date.

As at 31 December 2025 and 2024, the fair value of the brands acquired by the Group was as follows:

Amounts in Euros	2025	2024
My Tissue	1,257,549	1,257,549
My Tissue Ecologic +	1,142,451	1,142,451
Elegance	6,417,603	6,753,660
Magnum	8,136,603	8,562,676
Softy	4,469,402	4,703,442
Little Heroes	916,800	964,809
	22,340,408	**23,384,587**

In subsequent measurement, brands are recognised in the Group's consolidated financial statements at cost. They are not amortised and are tested for impairment at each reporting date. Impairment tests are performed by an external and independent entity using the relief-from-royalty (RfR) method, and no impairment losses were identified in respect of the brands. Where brands do not generate cash flows independently, the recoverable amount is determined at the level of the respective cash-generating unit (CGU), with the impairment test being carried out at that CGU in accordance with IAS 36.

Own brands are not recognised in the Group's consolidated financial statements, as they represent internally generated intangible assets.

Customer Portfolio

Within the scope of a business combination, whenever identifiable, the Group recognises separately in the consolidated financial statements as an asset measured at cost the value of the customer portfolio acquired, which corresponds to its fair value on the acquisition date.

As at 31 December 2025 and 2024, the customer portfolios acquired were as follows:

Amounts in Euros	2025	2024	Useful life 2025	Useful life 2024
Customer portfolio - Consumer tissue business in Spain	1,197,590	1,400,000	6	7
Customer portfolio - Consumer tissue business in the United Kingdom	47,419,067	52,957,272	17	18
	48,616,657	**54,357,272**		

In the subsequent measurement, the customer portfolio is deducted from the respective amortisations and impairment losses, if applicable.

The Group carries out impairment tests whenever events or circumstances may indicate that the book value of an asset exceeds its recoverable amount, being any impairment recognised in the income statement.

Intangible assets developed internally

Development expenses are only recognised as intangible assets to the extent that the technical capacity to complete the development of the asset is demonstrated and that it is available for own use or commercialisation. Expenses that do not meet these requirements, namely research expenses, are recorded as costs when incurred.

3.3. Property, plant and equipment

Movements in property, plant and equipment

Amounts in Euros	Land	Buildings and other constructions	Equipment and other tangibles	Assets under construction	Total
Gross amount					
Balance as at 1 January 2024	**121,593,704**	**577,228,593**	**3,922,674,887**	**160,754,394**	**4,782,251,578**
Change in the perimeter	-	2,875,637	96,215,441	3,122,596	102,213,674
Acquisitions	-	-	20,444,600	219,792,614	240,237,214
Disposals	(24,289)	-	(152,538)	(15,309)	(192,136)
Adjustments, transfers and write-offs	4,466,734	5,715,034	164,219,952	(179,727,640)	(5,325,920)
Exchange rate adjustment	-	74,979	2,517,537	92,269	2,684,785
Balance as at 31 December 2024	**126,036,149**	**585,894,243**	**4,205,919,879**	**204,018,924**	**5,121,869,195**
Acquisitions	-	-	9,362,995	199,978,945	209,341,940
Disposals	(4,650)	-	(540,356)		(545,006)
Adjustments, transfers and write-offs	3,125,297	3,485,577	263,009,353	(271,602,296)	(1,982,069)
Exchange rate adjustment		(133,753)	(5,012,353)	(203,260)	(5,349,366)
Balance as at 31 December 2025	**129,156,796**	**589,246,067**	**4,472,739,518**	**132,192,313**	**5,323,334,694**
Accumulated depreciation and impairment losses					
Balance as at 1 January 2024	**-**	**(399,078,078)**	**(3,149,949,709)**	**-**	**(3,549,027,787)**
Change in the perimeter	-	-	(7,088,063)	-	(7,088,063)
Depreciation for the period (Note 3.7)	-	(14,130,046)	(133,405,316)	-	(147,535,362)
Impairment (Note 3.7)		-	(7,364,638)	(308,965)	(7,673,603)
Disposals	-	-	27,662	-	27,662
Adjustments, transfers and write-offs	-	1,380,299	4,253,777	-	5,634,076
Exchange rate adjustment	-	(937)	(260,096)		(261,033)
Balance as at 31 December 2024	**-**	**(411,828,762)**	**(3,293,786,383)**	**(308,965)**	**(3,705,924,110)**
Depreciation for the period (Note 3.7)	-	(13,421,628)	(141,023,371)	-	(154,444,999)
Impairment (Note 3.7)	(1,032,716)	-	(2,178,356)	(142,965)	(3,354,037)
Disposals	-	-	520,929	-	520,929
Adjustments, transfers and write-offs	-	3,597,953	(1,933,302)		1,664,651
Exchange rate adjustment	-	4,695	697,680		702,375
Balance as at 31 December 2025	**(1,032,716)**	**(421,647,742)**	**(3,437,702,803)**	**(451,930)**	**(3,860,835,191)**
Net book value as at 1 January 2024	**121,593,704**	**178,150,515**	**772,725,178**	**160,754,394**	**1,233,223,791**
Net book value as at 31 December 2024	**126,036,149**	**174,065,481**	**912,133,496**	**203,709,959**	**1,415,945,085**
Net book value as at 31 December 2025	**128,124,080**	**167,598,325**	**1,035,036,715**	**131,740,383**	**1,462,499,503**

As at 31 December 2025, Assets under construction includes investments associated with ongoing development projects, in particular those relating to the collection and incineration of NCGs (Non-Condensable Gases) (Euro 15,779,028), Oxygen Delignification (Euro 17,019,227), the PM3 Rebuild (Euro 5,013,375), the adaptation of the combustion process for hydrogen (Euro 2,105,364) in Setúbal, the new Tissue cogeneration unit in Aveiro (Euro 16,816,441), the photovoltaic power plant (Euro 3,430,599), the new biomass boiler (Euro 7,803,669) in Vila Velha de Ródão, and the new cogeneration plant (Euro 7,036,475) in Figueira da Foz. The remainder is related to several projects for improving and optimising the production process.

Of the total investment of Euro 209,341,940, approximately 60% relates to investments classified as ESG and Euro 60,754,207 relates to investments under the Recovery and Resilience Plan (PRR).

Land includes Euro 121,260,737 (31 December 2024: Euro 116.934.845) classified in the individual financial statements as investment properties, from which Euro 84,315,709 (31 December 2024: Euro 79,989,817) relate to forestry land and Euro 36,945,028 (31 December 2024: Euro 36,945,028) to land allocated to industrial sites.

In 2024, the Group decided to proceed with the pre-engineering project for the rebuild of the PM3 machine in Setúbal, with the aim of converting the current production of high-grammage products into the production of more high-quality and efficient low-grammage products (LBW - Low Basis Weight), the market segment with the greatest potential for growth in replacing plastic. Accordingly, an impairment loss was recognised for the full net carrying amount of PM3, which as at 31 December 2025 amounted to Euro 5,997,205 (31 December 2024: Euro 7,116,061).

Additionally, as at 31 December 2025, as a result of the strategy to consolidate the roll operations in the United Kingdom into two strategic regions, Leyland and Leicester, the Group recognised an impairment loss on the property, plant and equipment of Navigator Tissue UK in the amount of Euro 3,486,553.

The commitments assumed by the Group for the acquisition of property, plant and equipment are detailed in Note 10.2 - Commitments.

Estimates and judgements

Recoverability of Property, plant and equipment

The recoverability of property, plant and equipment requires the Board of Directors to use estimates and assumptions, namely, whenever applicable, regarding the determination of the value in use for impairment tests to the Group's cash-generating units.

Useful life and depreciation

Property, plant and equipment present the most significant component of the Group's total assets. These assets are subject to systematic depreciation for the period that is determined to be their economic useful life. The determination of assets useful lives and the depreciation method to be applied is essential to determine the amount of depreciation to be recognised in the consolidated income statement of each period.

These two parameters are defined according to the best judgement of the Board of Directors for the assets and businesses in question, also considering the practices adopted by companies of the sector at the international level and the evolution of the economic conditions in which the Group operates.

Under IFRS, the estimate of the useful lives of assets should be reviewed if expectations regarding the expected economic benefits as well as the technical use planned for the assets differ from previous estimates. Changes resulting in depreciation charges for the period are accounted for prospectively.

Given the importance of this estimate, the Group uses, with some regularity, external and independent experts to assess the adequacy of the estimates used having the last report been completed during the second half of 2024, with reference to 1 January 2024, with no significant impact on the Group's useful lives.

Accounting policies

Property, plant and equipment

Recognition and initial measurement

Property, plant and equipment are shown at cost, less accumulated depreciation and impairment losses.

Depreciation and impairment

We use the straight-line method from the moment the asset is available for use and using the rates that best reflect their estimated useful life.

	Average useful life 2025	Average useful life 2024
Land (cost of preparing for afforestation)	50	50
Buildings and other constructions	10 – 30	10 – 30
Basic equipment	4 – 20	4 – 20
Transportation equipment	4 – 9	4 – 9
Tools	2 – 8	2 – 8
Administrative equipment	4 – 8	4 – 8
Other property, plant and equipment	4 – 10	4 – 10

The residual values of the assets and respective useful lives are reviewed and adjusted, on the date of the consolidated statement of financial position. If there are changes to useful lives, they are treated as a change in accounting estimate and are applied prospectively.

When the book value of the asset exceeds its realisable value, the asset is written down to the estimated recoverable amount, and an impairment charge is booked (Note 3.7).

Subsequent costs

Scheduled maintenance expenses are considered a component of the acquisition cost of property, plant and equipment and are fully depreciated by the next forecasted maintenance date.

All other repairs and maintenance costs are charged to the income statement in the financial period in which they are incurred.

Spare and maintenance parts

Spare parts are considered strategic as they are directly related to production equipment and their use is expected to last for more than two economic years. Maintenance parts considered as "critical spare parts" are recorded under non-current assets, as Property, plant and equipment. In accordance with this classification, spare parts are depreciated from the moment they become available for use and are assigned a useful life that follows the nature of the equipment, where they are expected to be integrated, not exceeding the remaining useful life of these.

Spare parts are accounted for as property, plant and equipment if they are material and used for more than one period, or if they are used only in relation to an item of property, plant and equipment. In other situations, spare parts are accounted for as part of inventories and recognised in the period when consumed.

Borrowing costs

Borrowing costs directly related to the acquisition or construction (if the construction or development period exceeds one year) of property, plant and equipment are capitalised and form part of the asset's cost.

During the periods presented, no financial charges for loans directly related to the acquisition or construction of property, plant and equipment were capitalised.

Write-offs and disposals

Gains or losses arising from write-offs or disposals are determined by the difference between the proceeds from the disposals when applicable less transaction costs and the carrying amount of the asset and are recognised in the income statement as Other operating income (Note 2.2) or Other operating expenses (Note 2.3).

3.4. Investment properties

Movement in investment properties

Amounts in Euros	Land	Buildings and other constructions	Total
Gross amount			
Balance as at 1 January 2024	**567,032**	**612,991**	**1,180,023**
Acquisitions	-	-	-
Disposals	**(25,371)**	**(82,308)**	**(107,679)**
Adjustments, transfers and write-offs	-	-	-
Balance as at 31 December 2024	**541,661**	**530,683**	**1,072,344**
Acquisitions	-	-	-
Disposals	-	-	-
Adjustments, transfers and write-offs	-	-	-
Balance as at 31 December 2025	**541,661**	**530,683**	**1,072,344**
Accumulated depreciation and impairment losses			
Balance as at 1 January 2024	**(399,372)**	**(317,247)**	**(716,619)**
Disposals	-	19,480	19,480
Impairment losses (Note 3.7)	-	(15,035)	(15,035)
Adjustments, transfers and write-offs	-	-	-
Balance as at 31 December 2024	**(399,372)**	**(312,802)**	**(712,174)**
Disposals	-	-	-
Impairment losses (Note 3.7)	-	309,227	309,227
Adjustments, transfers and write-offs	-	-	-
Balance as at 31 December 2025	**(399,372)**	**(3,575)**	**(402,947)**
Net book value as at 1 January 2024	**167,660**	**295,744**	**463,403**
Net book value as at 31 December 2024	**142,289**	**217,881**	**360,170**
Net book value as at 31 December 2025	**142,289**	**527,108**	**669,397**

The assets identified as investment properties mainly comprise: (i) the building located at Rua São José 35, 2º andar – A, 1150-321 Lisbon, owned by the subsidiary Empremédia – Corretores de Seguros, S.A., which ceased to be used in the Group's operating activities following the transfer, in March 2023, of the subsidiary's employees to Navigator's building on Avenida Fontes Pereira de Melo; and (ii) the land owned by Navigator Tissue Ródão, S.A., located in Miranda do Corvo, with a value of Euro 320,000.

These assets are not allocated to the Group's operating activity, nor do they have any future use determined.

3.5. Government grants

Government grants - movements

Amounts in Euros	2025 Financial	2025 Tax	2025 Total	2024 Financial	2024 Tax	2024 Total
Opening balance	**105,376,286**	**14,567,647**	**119,943,933**	**99,667,539**	**16,234,048**	**115,901,587**
Allocation	-	-	-	8,765,668	-	8,765,668
Charge-off (Note 3.7)	(3,929,949)	(1,398,687)	(5,328,636)	(3,056,921)	(1,666,401)	(4,723,322)
Other movements	(822,921)	-	(822,921)	-	-	-
Closing balance (Note 4.3)	**100,623,416**	**13,168,960**	**113,792,376**	**105,376,286**	**14,567,647**	**119,943,933**

The allocations in 2024 mainly relate to the sums allocated under the mobilising agendas of the Recovery and Resilience Plan (RRP) and decarbonisation initiatives.

Of the total amount awarded, Euro 34,335,961 was received during the period (Euro 43,952,298 as at 31 December 2024), as reflected in the Statement of Cash Flows.

As at 31 December 2025 and 2024, government grants, by company, were detailed as follows:

Amounts in Euros	2025 Financial	2025 Tax	2025 Total	2024 Financial	2024 Tax	2024 Total
AICEP investment contracts						
Enerpulp, S.A.	-	-	-	105,727	-	105,727
Navigator Pulp Aveiro, S.A.	1,149,225	560,605	1,709,830	1,806,126	721,286	2,527,412
Navigator Pulp Figueira, S.A.	-	6,056,067	6,056,067	144,135	6,755,137	6,899,272
Navigator Parques Industriais, S.A.	1,632,828	-	1,632,828	1,691,570	-	1,691,570
Navigator Tissue Aveiro, S.A.	2,258,117	6,552,288	8,810,405	2,429,628	7,091,224	9,520,852
	5,040,170	**13,168,960**	**18,209,130**	**6,177,186**	**14,567,647**	**20,744,833**
Under the Recovery and Resilience Plan						
Navigator Forest Portugal, S.A.	40,298	-	40,298	36,510	-	36,510
Viveiros Aliança, SA	16,578	-	16,578	18,161	-	18,161
Navigator Tissue Aveiro, S.A.	11,882,880	-	11,882,880	11,968,393	-	11,968,393
Navigator Paper Setúbal , S.A.	8,616,471	-	8,616,471	10,966,135	-	10,966,135
Navigator Pulp Aveiro, S.A.	17,994,901	-	17,994,901	17,752,757	-	17,752,757
Navigator Pulp Setúbal, S.A.	20,524,803	-	20,524,803	21,480,000	-	21,480,000
Navigator Tissue Ródão , S.A.	8,462,428	-	8,462,428	8,462,427	-	8,462,427
Navigator Pulp Figueira, S.A.	16,036,506	-	16,036,506	16,408,219	-	16,408,219
Navigator Paper Figueira, S.A.	4,613,896	-	4,613,896	4,621,122	-	4,621,122
Raiz	2,092,721	-	2,092,721	2,048,251	-	2,048,251
	90,281,482	**-**	**90,281,482**	**93,761,975**	**-**	**93,761,975**
Other						
Navigator Pulp Setúbal, S.A.	4,195,960	-	4,195,960	4,488,046	-	4,488,046
Raiz	962,948	-	962,948	949,079	-	949,079
Navigator Pulp Figueira , S.A.	142,856	-	142,856	-	-	-
	5,301,764	**-**	**5,301,764**	**5,437,125**	**-**	**5,437,125**
	100,623,416	**13,168,960**	**113,792,376**	**105,376,286**	**14,567,647**	**119,943,933**

The Group expects to recognise grants in profit or loss as follows:

Amounts in Euros	2025 Financial	2025 Tax	2025 Total	2024 Financial	2024 Tax	2024 Total
2025	-	-	-	2,543,940	1,398,687	3,942,627
2026	6,274,541	1,390,347	7,664,888	2,424,840	1,390,347	3,815,187
2027	5,657,424	1,390,304	7,047,728	1,787,665	1,390,304	3,177,969
2028	5,617,608	1,390,304	7,007,912	1,756,644	1,390,304	3,146,948
2029	5,354,595	1,209,424	6,564,019	1,517,326	1,209,424	2,726,750
After 2029	77,719,248	7,788,581	85,507,829	95,345,871	7,788,581	103,134,452
	100,623,416	**13,168,960**	**113,792,376**	**105,376,286**	**14,567,647**	**119,943,933**

Non-repayable Government grants

Incentive to increase pulp production capacity in Figueira da Foz

On 27 December 2018, Navigator Pulp Figueira, S.A signed a tax investment agreement with AICEP, related to the investment associated with the increase of pulp production capacity in Figueira da Foz, which includes a tax incentive up to the maximum amount of Euro 17,278,657, corresponding to 19.5% of the investment made, subject to the fulfilment of contractually defined objectives by 31 December 2025. This grant, of which Euro 14,437,235 has been drawn by the subsidiary, is being recognised over 20 years, until 2038, in proportion to the depreciation of the assets, although it has already been drawn in full since 2018, through a deduction from corporate income tax (IRC).

Incentives for the expansion project of the Cacia pulp mill

On 18 June 2014, the Group's subsidiary, Navigator Pulp Aveiro, S.A., signed two financial and tax incentive agreements with the AICEP – Agência para o Investimento e Comércio Externo de Portugal (Agency for Investment and Foreign Trade of Portugal), effective until 2023 and 2024, respectively, to support the investment to be promoted by that company in the capacity increase project of Aveiro pulp mill, with a total amount of Euro 49.3 million.

The approved grants amount to Euro 9.753 million (repayable) and Euro 5.644 million (tax incentive). This amount has been fully utilised since 2016 and will be recognised in profit or loss in 20 years, until 2034. The contract includes an achievement bonus already recognised in the balance sheet and received in April 2024, which corresponds to the conversion of 75% of the repayable grant in a non-repayable grant, in the amount of Euro 7,314,397, subject to compliance with the objectives established in the contract.

Incentives for the project to build a second tissue machine in Vila Velha de Ródão

In March 2014, the subsidiary Navigator Tissue Ródão, S.A. signed investment contracts with AICEP – Agência para o Investimento e Comércio Externo de Portugal (Agency for Investment and Foreign Trade of Portugal), effective between 2014 and 2022, for the construction of a second tissue paper machine at its Vila Velha de Ródão facility, with the aim of contributing part of the investment through EU funds by means of refundable financial incentives amounting to Euro 9,647,700, convertible into non-refundable incentives, up to a limit of 50%, *i.e.*, Euro 4,823,850.

The incentive should have been paid in two instalments, on 31 December 2016 and 2018, but was only settled in April 2025 (31 December 2024: Euro 2,407,395) (Note 4.2).

Grant to the Setúbal Lime Kiln Conversion project

As part of the Carbon Neutrality Roadmap, the Group has signed a financial investment contract with the European Union to support investment by Navigator Pulp Setúbal in the conversion of the lime kiln at the Setúbal pulp mill, with a planned total

investment of Euro 7,500,000. The maximum approved grant amounts to Euro 4,488,046 and will be paid through a single non-repayable instalment, up to the end of the third year of operation of the equipment, which began in October 2025.

Recovery and Resilience Plan

The Navigator Group is involved in four Agendas for Business Innovation of the Recovery and Resilience Plan (RRP), through investment of Euro 91.8 million. The Group, through Navigator Paper Setúbal, S.A., is leading the "From Fossil to Forest" (FF2F) Agenda, whose main goal is to develop a range of packaging solutions—focused on the gKRAFT brand to be launched in 2021—and the production of micro fibrillated cellulose for developing mechanical properties and functional barriers (to fats and liquids, amongst others) in these papers. In total, the Group will benefit from support of around Euro 25.9 million from this component of the RRP (C5 - Corporate Capitalization and Innovation).

During 2022, the Group companies Navigator Paper Setubal, S.A., Navigator Pulp Setúbal, S.A., Navigator Paper Figueira, S.A., Navigator Pulp Figueira, S.A., Navigator Pulp Aveiro, S.A. and Navigator Tissue Aveiro, S.A. applied for "Apoio à Descarbonização da Indústria" (Support for Decarbonisation of Industry) under the RRP. This support is part of a set of measures under Component 11 (C11) of the RRP, which aims to contribute to the goal of carbon neutrality by promoting energy transition through energy efficiency, support for renewable energy, focusing on the adoption of low-carbon processes and technologies in industry, the adoption of energy efficiency measures in industry and the incorporation of energy from renewable sources and energy storage. Recently, this was extended to a second phase of application, in which Navigator Tissue Ródão S.A., like the other companies, presented a series of initiatives related to its carbon neutrality. In the future, the Group expects to invest Euro 173.1 million in these initiatives, of which it hopes to receive Euro 75.8 million in funding.

Also in 2022, Group companies applied for RRP incentives for the "Rede Nacional de Test Bed" (National Test Bed Network), which aims to create a national network providing services to companies for the development and testing of new products and services. The application, involving an investment of Euro 2.2 million, was approved at the end of 2024 and IAPMEI decided to award Navigator Pulp Figueira. S.A. Euro 1.4 million.

However, the Group's participation in the RRP is not complete without RAIZ's participation in Component 12 of the RRP, related to the Bioeconomy, where it plans to invest Euro 1.7 million and receive an incentive of Euro 1.4 million to accelerate, in partnership with CITEVE and other 52 promoters, the creation of high value-added products from biological resources as an alternative to fossil-based materials, while maintaining and even improving quality standards, with great potential in different market segments.

Repayable government grants

On 13 December 2017, the subsidiary Navigator Tissue Aveiro, S.A. entered into an investment agreement with AICEP, effective until 2026, for the construction of the new tissue mill in Aveiro. This agreement comprises a financial incentive in the form of a repayable grant, which includes a grace period of two years, without payment of interest, up to a maximum amount of Euro 42,166,636, corresponding to 35% on the amount of expenses considered eligible, which were estimated at Euro 120.476 million. As at 31 December 2025, the repayable grant has been fully received.

On 20 April 2018, the same entity was also awarded with a tax incentive granted through the compliance of contractually defined requirements until 31 December 2028, whose maximum amount will be Euro 11,515,870, corresponding to 10% of the expenses associated with the project investment (see Note 5.7).

This amount has been fully utilised since 2019 and will be recognised in profit or loss, on average, in 24 years, until 2043.

There are no unfulfilled conditions and other contingencies linked to Government grants that have been recognised and Navigator is complying with the conditions according to plan.

Accounting policies

Government grants

Government grants received to compensate the Group for investments made in Property, plant and equipment, including those attributed as tax credits, are classified as Deferred income (Note 4.3 - Payables) and are recognised in income over the estimated useful life of the respective subsidised assets, and are associated with the depreciation of the period (Note 3.7), for presentation purposes.

Repayable government grants

Government grants, in the form of repayable loans at a subsidised rate, are discounted on the date of initial recognition based on the market interest rate at the date of grant, the value of the discount constituting the value of the grant to be amortised over the period of the loan or asset whose acquisition it is intended to finance, depending on the activities financed. These liabilities are included in the caption Interest-bearing liabilities (Note 5.7). Grants received are classified as a financing activity in the statement of cash flows.

3.6. Right-of-use assets

Movements in right-of-use assets

Amounts in Euros	Forestry lands	Buildings	Vehicles	Software licenses	Other lease assets	Total
Gross amount						
Balance as at 1 January 2024	**69,946,175**	**4,352,402**	**11,936,414**	**1,214,094**	**11,184,460**	**98,633,545**
Change in the perimeter	-	930,133	276,256	175,801	42,512,894	43,895,084
Acquisitions	5,630,367	117,679	4,275,979	35,253	5,340,453	15,399,731
Adjustments, transfers and write-offs	(1,344,968)	(7,922)	(1,365,244)	(49,559)	(3,902,749)	(6,670,442)
Exchange rate adjustment		24,252	7,613	3,823	1,092,764	1,128,452
Balance as at 31 December 2024	**74,231,574**	**5,416,544**	**15,131,018**	**1,379,412**	**56,227,822**	**152,386,370**
Acquisitions	6,792,064	26,503	1,784,368	-	29,434,164	38,037,099
Adjustments, transfers and write-offs	(2,838,710)	-	(715,466)	(125,842)	(621,260)	(4,301,278)
Exchange rate adjustment		(47,490)	(13,345)	(4,222)	(1,684,461)	(1,749,518)
Balance as at 31 December 2025	**78,184,928**	**5,395,557**	**16,186,575**	**1,249,348**	**83,356,265**	**184,372,673**
Accumulated depreciation and impairment losses						
Balance as at 1 January 2024	**(16,783,193)**	**(2,564,716)**	**(6,573,251)**	**(1,121,493)**	**(6,546,437)**	**(33,589,090)**
Change in the perimeter		(681,574)	(72,706)	(142,632)	(11,119,701)	(12,016,613)
Depreciation (Note 3.7)	(4,219,898)	(695,288)	(2,517,949)	(154,255)	(5,582,615)	(13,170,005)
Adjustments, transfers and write-offs	1,344,968	7,922	1,252,660	49,559	2,715,166	5,370,275
Exchange rate adjustment		(20,060)	(2,765)	(3,364)	(303,582)	(329,771)
Balance as at 31 December 2024	**(19,658,123)**	**(3,953,716)**	**(7,914,011)**	**(1,372,185)**	**(20,837,169)**	**(53,735,204)**
Depreciation (Note 3.7)	(4,557,229)	(602,316)	(2,646,796)	(6,992)	(6,991,210)	(14,804,543)
Adjustments, transfers and write-offs	2,078,069	-	612,832	125,841	673,032	3,489,774
Exchange rate adjustment		42,916	5,305	3,988	693,268	745,477
Balance as at 31 December 2025	**(22,137,283)**	**(4,513,116)**	**(9,942,670)**	**(1,249,348)**	**(26,462,079)**	**(64,304,496)**
Net book value as at 1 January 2024	**53,162,982**	**1,787,686**	**5,363,163**	**92,601**	**4,638,023**	**65,044,454**
Net book value as at 31 December 2024	**54,573,451**	**1,462,828**	**7,217,007**	**7,227**	**35,390,653**	**98,651,166**
Net book value as at 31 December 2025	**56,047,645**	**882,441**	**6,243,905**	**-**	**56,894,186**	**120,068,177**

The caption Forestry Lands relates essentially to the land use rights of existing forest exploration, whose agreements usually have a duration of 24 years, and may be cancelled in advance if the 2nd harvest takes place before the 24th year of the agreement term.

The caption Buildings mainly refers to the lease agreement entered into between The Navigator Company, S.A. e a MaxiRent – Fundo de Investimento Imobiliário Fechado for the building located at Avenida Fontes Pereira de Melo, in Lisbon, for use as an office until May 2027.

Other lease assets include rental agreements for forklifts, warehouses, and converting equipment belonging to the Navigator Tissue UK Group.

Cash flows associated with lease payments correspond to the financial amortisation of Euro 14,189,305 and interest of Euro 4,904,606 (Note 5.10), amounting to Euro 19,093,912, as shown in the Statement of Cash Flows.

Accounting policies

At the date the lease enters into force, the Group recognises a right-of-use asset at its cost, which corresponds to the initial amount of the lease liability adjusted for: i) any prepayments; ii) lease incentives received; and iii) initial direct costs incurred.

To the right-of-use asset, the estimate of removing and/or restoring the underlying asset and/or the location where it is located may be added, when required by the lease agreement.

The right-of-use asset is subsequently depreciated using the straight-line method, from the start date until the lower between the end of the asset's useful life and the lease term. Additionally, the right-of-use asset reduced of impairment losses, if any, and adjusted for any remeasurement of the lease liability. The useful life considered for each class of right-of-use asset is equal to the useful life of Property, plant and equipment (Note 3.3) in the same class when there is a call option, and the Group expects to exercise it.

Short-term leases and low-value asset leases

The Group recognises lease payments for leases with a term of 12 months or less, and for leases of assets with an individual acquisition value of less than Euro 5,000, directly as operating expenses for the year (Note 2.3), on a straight-line basis.

3.7. Depreciation, amortisation and impairment losses

Amounts in Euros	2025	2024
Depreciation of property, plant and equipment for the period (Note 3.3)	154,444,999	147,535,362
Utilisation of investment grants (Note 3.5)	(5,328,636)	(4,723,322)
Depreciation of property, plant and equipment, net of utilised grants	**149,116,363**	**142,812,040**
Impairment of property, plant and equipment - losses (Note 3.3)	4,830,943	7,673,603
Impairment of property, plant and equipment - reversals (Note 3.3)	(1,476,906)	-
Impairment of property, plant and equipment for the period	**3,354,037**	**7,673,603**
Amortisation of intangible assets for the period (Note 3.2)	**4,706,669**	**4,044,107**
Impairment of intangible assets - losses	-	145,673
Impairment of intangible assets - reversals	(145,674)	-
Impairment of intangible assets for the period (Note 3.2)	**(145,674)**	**145,673**
Depreciation of right-of-use assets for the period (Note 3.6)	**14,804,543**	**13,170,005**
Impairment of investment properties – reversals	(320,000)	-
Impairment of investment properties – losses	10,773	15,035
Impairment of investment properties for the period (Note 3.4)	**(309,227)**	**15,035**
	171,526,711	**167,860,464**

The Group regularly uses external and independent experts to assess its industrial assets, as well as to assess the adequacy of the estimates used in terms of the useful lives of these assets.

In 2024, the Group requested an external valuation of its assets by an independent and specialised entity, which estimated the useful life of the assets, considering current conditions and the functional obsolescence prevailing at the time the assessment was carried out. The study took into account technical information on the assets allocated to the production centres, including the technical, physical and technological durability of the equipment, but no significant differences were identified between the estimated useful lives and those practised by the Group, other than those referred to in Note 3.3.

3.8. Biological assets

Movements in biological assets

Amounts in Euros	2025	2024
Opening balance	**115,250,198**	**115,591,979**
Logging in the period	(24,607,553)	(22,275,720)
Growth	27,665,383	25,895,749
New planted areas and replanting	4,143,545	3,091,316
Other changes in fair value		
- change in the price of wood	28,231,694	21,818,100
- change in the cost-of-capital rate	(9,150,600)	6,890,813
- impact of forest fires	(596,100)	(3,030,511)
- changes in other species	(4,427,831)	554,567
- transportation logistics costs	-	(24,407,600)
- fixed structure costs	(2,003,400)	(3,253,000)
- impact of changes in the harvesting cycle in Mozambique	(9,091,022)	-
- other changes in expectations	(2,571,114)	(6,299,966)
Total changes	**7,593,002**	**(1,016,252)**
Exchange rate adjustment	(2,196,557)	674,471
Closing balance	**120,646,643**	**115,250,198**

The Navigator Group considers, in accordance with IAS 41, mature assets to be those that have reached the necessary specifications to obtain the maximum yield based on their profitability, supply needs and opportunity cost. Typically, the forest in Portugal reaches its maturity between 8 and 12 years, and this reference depends on the species, soil conditions, as well as edaphoclimatic conditions. Data on the forest, its condition and its future potential are measured at least twice throughout its growth cycle. As at 31 December 2025, mature assets accounted for approximately 57% (52% in 31 December 2024) of Navigator's forest in Portugal, being recognised at fair value.

In Mozambique, as part of the annual review of the fair value of biological assets, certain assumptions of the valuation model were updated in order to better reflect the country's operational reality, taking into account, in particular, recent developments in operations and the timber sales agreements currently in force. These updates had a positive, non-material impact, estimated at approximately Euro 2.5 million.

As at 31 December 2025 and 2024, biological assets, by species, is detailed as follows:

Amounts in Euros	2025	2024
Eucalyptus (Portugal)	93,343,503	85,569,146
Eucalyptus (Spain)	2,597,809	3,081,361
Pine (Portugal)	5,525,987	5,798,144
Cork oak (Portugal)	(2,665,657)	1,490,017
Other species (Portugal)	73,107	73,107
Eucalyptus (Mozambique)	21,771,894	19,238,423
	120,646,643	**115,250,198**

The increase in the fair value of eucalyptus in Portugal is primarily due to the rise in both long-term and spot prices for timber delivered to the factory, as well as higher felling and skidding costs.

The decrease in the fair value of cork oak is due to the expected reduction in cork selling prices.

These amounts correspond to Board of Directors' expectation of the volumes to be extracted from its woodlands in the future, as follows:

Amounts in Euros	2025	2024
Eucalyptus (Portugal) - Potential future of wood extractions k m^3ssc	10,059	9,909
Eucalyptus (Spain) - Potential future of wood extractions k m^3ssc	354	244
Pine (Portugal) - Potential future of pine extractions k tonne	301	282
Cork Oak (Portugal) - Potential future of cork extractions k @	434	458
Eucalyptus (Mozambique) - Potential future of wood extractions k m^3ssc	6,199	5,165

Concerning Eucalyptus, the most relevant biological asset in the consolidated financial statements, the Group extracted, in 2025, 681,215 m^3ssc of wood from its owned and explored forests (31 December 2024: 611,862 m^3ssc).

As at 31 December 2025 and 2024, (i) there are no amounts of biological assets whose property is restricted and/or pledged as guarantee for liabilities, nor there are non-reversible commitments related to the acquisition of biological assets, and (ii) there are no government grants related to biological assets recognised in the Group's consolidated financial statements.

Estimates and judgements

Assumptions

Assumptions corresponding to the nature of the assets being valued were considered:

- Productivity of forests;
- Timber sale price (where there is an active market), net of harvesting costs, rent for owned, leased and concession-held land, skidding and transportation costs, planting and maintenance costs, and the cost of leasing forest land; the trend value for 2025 has increased by 4% compared to 2024.
- Discount rate, 2025: 5.06% (2024: 4.27 %) for Portugal and Spain and 21.6% (2024:21.6%) in determining the fair value of Mozambique. The Group incorporates the fire risk into the model's cash flows. If this risk were incorporated into the discount rate, it would be of 7.28% and 22.22%, in Portugal and Mozambique, respectively.

Sensitivity analysis

The Group considers the discount rate used in Portugal and Mozambique and the forward price of wood as the most significant variables.

Changes in the assumptions may imply the appreciation/depreciation of these assets:

Amounts in Euros	2025	2024
1) Increase of 0.5% in the discount rate in Portugal		
Depreciation of Portugal's forest assets	5,461,664	5,868,859
2) Decrease of 3% in forward price		
Depreciation of Portugal's forest assets	11,507,387	11,978,891
3) Increase of 0.5% in the discount rate in Mozambique		
Depreciation of Mozambique's forest assets	470,355	206,777
4) Decrease of 3% in forward price		
Depreciation of Mozambique's forest assets	957,732	769,860

Accounting policies

The Group's biological assets comprise the forests held for the production of timber, suitable for incorporating in the production of BEKP or for sale on the market, mostly eucalyptus, but also include other species such as pine and cork oak.

Forest land owned by the Group is included in Property, plant and equipment in the consolidated financial position and is valued in accordance with the accounting policy described in Note 3.3. Forest land that is not owned by the Navigator Group and that is leased is valued in accordance with the accounting policy described in Note 3.6 and is presented in the consolidated balance sheet under Right-of-use assets.

Fair Value (level 3 of the IFRS 13 fair value hierarchy)

When calculating the fair value of forests, the Group uses the discounted cash flows method, based on a model developed in house, regularly tested by independent external assessments.

In the model developed, assumptions are considered corresponding to the nature of the assets being assessed, namely, the development cycle of the different species, the productivity of the forests, climate and other environmental considerations, the wood sales price (when there is an active market) less the cost of harvesting, the rents of own, leased land, replanting and transportation, the costs of planting and maintenance, the cost inherent in leasing the forest land, and the discount rate.

The main unobservable inputs of the fair value model are detailed as follows, and the amount of the fair value of biological assets will increase / (decrease) respectively if:

- Wood sales prices increase / (decrease);
- Estimated cutting, replanting and transportation costs decrease / (increase);
- Estimated planting and maintenance costs decrease / (increase); and
- The discount rate decrease / (increase).

The discount rate corresponds to a market rate without inflation, in a manner consistent with the structure of forecasts, determined on the basis of the Navigator Group's expected rate of return on its forests, which are intended to be sold intragroup.

Concession areas

The costs incurred with the site preparation before the first forestation are recorded as property, plant and equipment and depreciated in line with its expected useful lives corresponding to the concession period.

Change of estimates

Changes in estimates of growth, growth period, price, cost and other assumptions are recognised in the income statement as fair value adjustments of biological assets.

Harvesting

At the time of harvesting, wood is recognised at fair value less estimated costs since that point until the point of sale, which is the initial cost of the inventory.

4. Working capital

4.1. Inventories

4.1.1. Inventories - detail by nature

Amounts net of accumulated impairment losses

	2025			2024		
Amounts in Euros	Gross amount	Impairment	Net realisable amount	Gross amount	Impairment	Net realisable amount
Raw materials	198,171,331	(9,057,742)	189,113,589	166,750,856	(8,473,131)	158,277,725
Goods	224,734	(4,595)	220,139	117,304	(25,591)	91,713
Subtotal (Note 4.1.2)	**198,396,065**	**(9,062,337)**	**189,333,728**	**166,868,160**	**(8,498,722)**	**158,369,438**
Finished and intermediate products	111,946,807	(4,316,214)	107,630,593	147,341,926	(5,882,791)	141,459,135
Goods and work in progress	4,042,225	(321,390)	3,720,835	3,410,862	(296,503)	3,114,359
By-products and waste	5,600,386	-	5,600,386	5,507,278	(5,251,843)	255,435
Subtotal (Note 4.1.3)	**121,589,418**	**(4,637,604)**	**116,951,814**	**156,260,066**	**(11,431,137)**	**144,828,929**
Total	**319,985,483**	**(13,699,941)**	**306,285,542**	**323,128,226**	**(19,929,859)**	**303,198,367**

Inventories of finished and intermediate products - distribution by geographical area

Amounts in Euros	2025	%	2024	%
Portugal				
BEKP pulp	15,777,659	14.66%	11,414,966	8.07%
UWF Paper	31,462,233	29.23%	49,648,137	35.10%
Tissue Paper	16,478,086	15.31%	18,818,456	13.30%
Other	-	0.00%	-	0.00%
	63,717,978	**59.20%**	**79,881,559**	**56.47%**
Rest of Europe				
BEKP pulp	4,091,919	3.80%	4,204,139	2.97%
UWF Paper	3,062,580	2.85%	5,624,482	3.98%
Tissue Paper	16,652,779	15.47%	19,397,059	13.71%
	23,807,278	**22.12%**	**29,225,680**	**20.66%**
USA				
UWF Paper	15,888,811	14.76%	29,715,421	21.01%
	15,888,811	**14.76%**	**29,715,421**	**21.01%**
South Africa				
UWF Paper	3,947,100	3.67%	2,636,475	1.86%
	3,947,100	**3.67%**	**2,636,475**	**1.86%**
Mozambique				
Wood	269,426	0.25%	-	0.00%
	269,426	**0.25%**	**-**	**0.00%**
	107,630,593	**100.00%**	**141,459,135**	**100.00%**

Finished and intermediate products inventories include Euro 2,440,721 (31 December 2024: Euro 10,358,907) relating to inventories for which invoices have already been issued but whose control has not been transferred to Trade receivables.

As at 31 December 2025 and 2024, there are no inventories in which ownership is restricted and/or pledged as collateral for liabilities.

4.1.2. Cost of goods sold and materials consumed in the period

Amounts in Euros	2025	2024
Opening balance	166,868,160	149,210,888
Initial impairment	-	9,141,335
Purchases	897,998,555	904,798,029
Change in the perimeter	-	(14,152,590)
(Losses) / Gains on inventories (Notes 2.2 and 2.3)	(1,880,026)	(1,168,179)
Exchange rate effect	(955,234)	(412,836)
Closing balance	(198,396,065)	(166,868,160)
Cost of goods sold and materials consumed (Note 2.3)	**863,635,390**	**880,548,487**

Cost of goods sold and materials consumed - detail by product

Amounts in Euros	2025	2024
Wood / Biomass	340,270,506	378,528,137
Natural gas	38,890,990	36,750,618
Other fuels	16,873,097	18,570,993
Chemicals	175,465,552	171,452,982
Pulp (BEKP)	26,159,380	20,285,603
Pulp (Pine)	40,267,694	40,749,985
Paper (heavyweight)	4,541,043	4,712,779
Tissue paper (Reels)	109,003,803	92,789,681
Consumables / Warehouse material	32,690,573	35,667,390
Packaging materials	78,277,857	79,725,432
Other materials	1,194,895	1,314,887
	863,635,390	**880,548,487**

The cost of wood / biomass only relates to wood purchases to entities outside the Group, either domestic or foreign.

In 2025, the increase in the cost of tissue paper is primarily due to the incorporation of 12 months' operations by the Navigator Tissue UK Group (in 2024, 8 months were taken into account).

4.1.3. Change in production in the period

Amounts in Euros	2025	2024
Opening balance	(156,260,066)	(137,279,474)
Initial impairment	-	(11,440,619)
Adjustments	1,184,403	(1,886,593)
Change in the perimeter	-	(11,422,914)
Losses / (Gains) on inventories (Notes 2.2 and 2.3)	1,357,390	2,568,511
Exchange rate effect	2,448,034	(298,785)
Closing balance	121,589,418	156,260,066
Changes in production (Note 2.3)	**(29,680,821)**	**(3,499,808)**

4.1.4. Movements in impairment on inventories

Amounts in Euros	2025	2024
Opening balance	**(19,929,859)**	**(20,581,954)**
Increases (Note 2.3)	(2,291,493)	(3,165,457)
Reversals (Note 2.2)	8,166,835	5,068,999
Impact on profit or loss for the period	**5,875,342**	**1,903,542**
Additions to the perimeter of consolidation	-	(1,192,426)
Exchange rate effect	59,757	(35,719)
Utilisations	294,819	(23,302)
Closing balance	**(13,699,941)**	**(19,929,859)**

As mentioned in Note 2.3, the increase recorded in impairment on inventories essentially includes the recognition of Euro 1,032,506 relating to moulded pulp inventory and Euro 557,352 relating to spare parts. In 2024, impairment on inventories essentially include the recognition of Euro 1,724,970 in impairment losses for UWF and tissue paper waste and Euro 1,248,818 for slow movers.

Accounting policies

Inventories are valued in accordance with the following criteria:

Goods and raw materials

Goods and raw, subsidiary and consumable materials are valued at the lower of their purchase cost or their net realisable value. The purchase cost includes ancillary costs and it is determined using the weighted average cost as the valuation method.

Finished and intermediate products and work in progress

Finished and intermediate products and work in progress are valued at the lower of their production cost (which includes incorporated raw materials, labour and general manufacturing costs, based on a normal production capacity level) or their net realisable value.

The net realisable value corresponds to the estimated selling price, after deducting estimated completion and selling costs. The difference between production cost and net realisable value, if lower, are recorded as an operational cost.

4.2. Receivables

Amounts in Euros	Non-current	Current	Total	Non-current	Current	Total
Trade receivables	-	292,623,488	292,623,488	-	305,042,497	305,042,497
Receivables - related parties (Note 10.3)	-	18,491	18,491	-	-	-
State	-	35,515,774	35,515,774	-	57,969,739	57,969,739
Grants receivable	699,306	32,536,150	33,235,456	10,684,900	56,582,606	67,267,506
Department of Commerce (EUA)	1,111,730	-	1,111,730	718,183	-	718,183
Accrued income	-	12,513,640	12,513,640	-	17,223,776	17,223,776
Deferred expenses	-	18,783,951	18,783,951	-	19,981,490	19,981,490
Derivative financial instruments (Note 8.2)	-	8,742,410	8,742,410	-	21,022,301	21,022,301
Other	164,351	19,564,905	19,729,256	1,739,854	18,876,212	20,616,066
	1,975,387	**420,298,809**	**422,274,196**	**13,142,937**	**496,698,621**	**509,841,559**

State

State is detailed as follows:

Amounts in Euros	2025	2024
Value Added Tax - recoverable	7,030,662	10,943,833
Value Added Tax - repayment requests	28,485,112	47,025,906
	35,515,774	**57,969,739**

As at 31 December 2025, the amount of repayment requests comprised the following, by company and by month:

Amounts in Euros	Aug/2025	Nov/2025	Dec/2025	Total
The Navigator Company, S.A.	-	-	23,840,112	23,840,112
Bosques do Atlântico, S.L.	310,000	-	-	310,000
Navigator Abastecimento de Madeira, A.C.E.	-	410,000	450,000	860,000
Navigator Pulp Setúbal, S.A.	-	3,475,000	-	3,475,000
	310,000	**3,885,000**	**24,290,112**	**28,485,112**

Up to the date of issuing this report, the outstanding amounts as at 31 December 2025, had already been received.

As at 31 December 2024, the amount of repayment requests comprised the following, by company and by month:

Amounts in Euros	Nov/2024	Dez/2024	Total
The Navigator Company, S.A.	25,926,796	14,349,110	40,275,906
Navigator Tissue Ródão S.A.	-	1,940,000	1,940,000
Navigator Abastecimento de Madeira, A.C.E.	440,000	-	440,000
Navigator Paper Setúbal, S.A.	-	1,700,000	1,700,000
Navigator Pulp Setúbal, S.A.	-	1,970,000	1,970,000
Navigator Pulp Figueira, S.A.	-	700,000	700,000
	26,366,796	**20,659,110**	**47,025,906**

All these amounts were received during the first quarter of 2025.

Grants receivable

Grants receivable are detailed as follows:

Amounts in Euros	2025 Non-current	2025 Current	2025 Total	2024 Non-current	2024 Current	2024 Total
AICEP Contracts	-	-	-	-	2,407,395	2,407,395
Recovery and Resilience Plan	-	28,213,703	28,213,703	6,738,024	53,054,466	59,792,490
Other	699,306	4,322,447	5,021,753	3,946,876	1,120,745	5,067,621
	699,306	**32,536,150**	**33,235,456**	**10,684,900**	**56,582,606**	**67,267,506**

The amount of Euro 2,407,395 (Note 3.5) corresponds to the second instalment of the non-repayable grant awarded under the investment incentive for the construction of the second tissue paper machine at the Vila Velha de Ródão facility, was received in April 2025.

Department of Commerce (EUA)

As at 31 December 2025, the balance corresponds to the amount receivable from the Department of Commerce (DoC) following the investigation initiated in 2015 of alleged dumping practices in exports of UWF paper to the United States by the subsidiary Navigator.

During 2024, the Department of Commerce confirmed the final rate to be applied for the 7th review period, from March 2022 to February 2023, at 1.07%, therefore the Group received the amount of Euro 2,095,637 for the difference between the deposits made and the final rate payable.

In 2025, the subsequent review periods (8th, 9th and 10th) remain ongoing. Navigator estimates that it will be required to pay the DoC approximately Euro 3,984,952 (Note 4.3) for the 8th and 10th review periods, and that is expected to receive Euro 1,111,730 for the 9th review period.

Amounts paid by the Group in respect of review periods 1 to 7 amount to Euro 26,809,402 as follows:

Amounts in Euros	Amount paid by the Group
Review periods (POR)	
POR 1: Aug 15 - Feb 17	3,718,475
POR 2: Mar 17 - Feb 18	2,011,029
POR 3: Mar 18 - Feb 19	7,089,677
POR 4: Mar-19 - Feb 20	2,767,437
POR 5: Mar-20 - Feb 21	3,006,925
POR 6: Mar-21 - Feb 22	7,011,948
POR 7: Mar-22 - Feb 23	1,203,911
	26,809,402

Accrued Income and Deferred Expenses

Accrued income and deferred expenses are detailed as follows:

Amounts in Euros	2025	2024
Accrued income		
Derivatives	3,001,762	-
Energy sales	7,728,874	11,535,948
Insurance	1,221,099	-
Other	561,905	5,687,828
	12,513,640	**17,223,776**
Deferred expense		
Insurance	2,735	2,735
Rentals	12,458,981	14,295,170
Other	6,322,235	5,683,585
	18,783,951	**19,981,490**
	31,297,591	**37,205,266**

Other receivables

Other current and non-current receivables consist of the following:

Other non-current receivables

Amounts in Euros	2025	2024
Collateral	42,829	49,513
Other shareholdings (Almascience , Forestwise, Cecolab, Colab BIOREF)	69,800	69,800
Receivables - leasing	-	1,572,232
Other receivables	51,722	48,309
	164,351	**1,739,854**

Other current receivables

Amounts in Euros	2025	2024
Advances to personnel	82,587	86,822
Advances to suppliers	16,671,015	14,653,095
Receivables - leasing	1,554,868	-
Other receivables	1,256,435	4,136,295
	19,564,905	**18,876,212**

The increase in advances to suppliers is due to advances paid at the end of the year for timber imports.

Accounting policies

Trade and other receivables

Classification

Trade receivables result from the Group's main activities and the business model followed is the collection of contractual cash flows.

Balances from other receivables generally assume the business model of collecting contractual cash flows.

Initial measurement

At fair value.

Subsequent measurement

At amortised cost, net of impairment losses.

Impairment on Trade receivables

Impairment losses are recorded based on the simplified model provided for in IFRS 9, recording expected losses until maturity. The expected losses are determined on the basis of the experience of historical actual losses over a statistically significant period and representative of the specific characteristics of the underlying credit risk (Note 8.1.4).

Impairment on other receivables

Impairment losses are recorded on the basis of the general estimated credit loss model of IFRS 9.

4.3. Payables

Amounts in Euros	2025	2024
Trade payables - current account	192,567,957	215,175,131
Trade payables - invoices pending - logistics	16,565,812	17,471,405
Trade payables - invoices pending - other	86,270,802	86,751,313
Trade payables - fixed assets - current account	40,387,756	52,669,840
State	51,727,971	25,877,177
Related parties (Note 11.3)	2,772,532	1,496,697
Other payables - CO_2 emission allowances	35,946,103	34,607,846
Shareholders	-	99,999,451
Other payables	14,429,442	21,613,139
Derivative financial instruments (Note 8.2)	7,990,119	6,311,500
Accrued expenses - payroll	35,919,745	40,827,184
Accrued expenses - interest payable	4,331,113	4,733,532
Wood suppliers bonus	3,579,249	2,575,541
Water resource fee	1,776,907	1,858,098
Rent liabilities	15,885,254	20,040,608
Other accrued expenses	13,785,696	15,995,099
Non-repayable grants	11,382,546	10,566,113
Other deferred income	210,538	-
Payables - current	**535,529,542**	**658,569,674**
Non-repayable grants	106,127,488	116,001,306
Department of Commerce (USA) (Note 4.2)	3,984,952	1,160,207
Payables - non-current	**110,112,440**	**117,161,513**
	645,641,982	**775,731,187**

The decrease in the balance of Trade payables – fixed assets is due to the lower volume of investments made in 2024, as mentioned in Note 2.1.

As at 31 December 2025, CO_2 emission allowances relate to the effect of recognising allowances granted free of charge for 2025.

The outstanding balance under Shareholders as at 31 December 2024 corresponds to the advance on profits for 2024, which was paid on 9 January 2025 (Note 5.4).

State – Details

Amounts in Euros	2025	2024
Personal income tax withhold (IRS)	2,835,093	3,630,991
Value Added Tax	45,459,918	18,939,864
Social Security contributions	3,298,458	3,051,986
Other	134,502	254,336
	51,727,971	**25,877,177**

As at 31 December 2025 and 2024, there were no arrears with the State.

Non-repayable grants – details

Amounts in Euros	2025	2024
Government grants (Note 3.5)	7,664,888	3,942,627
Other grants	3,717,658	6,623,486
Non-repayable grants - current	**11,382,546**	**10,566,113**
Government grants (Note 3.5)	106,127,488	116,001,306
Non-repayable grants - non-current	**106,127,488**	**116,001,306**
	117,510,034	**126,567,419**

Accounting policies

Trade payables and other current liabilities are initially recorded at their fair value and subsequently measured at amortised cost.

5. Capital structure

5.1. Capital management

Capital management policy

For capital management purposes, the Group defines capital as including equity and net debt. The Group's objectives in relation to capital management are:

I. To safeguard its ability to continue as a going concern and thus provide returns for Shareholders and benefits for its remaining Stakeholders;

II. To keep a solid capital structure to support the growth of its business; and

III. To maintain an optimal capital structure that enables it to reduce the cost of capital.

In order to maintain or adjust its capital structure, the Group can adjust the amount of dividends payable to its Shareholders, return capital to its Shareholders, issue new shares or sell assets to lower its borrowings.

In line with the sector, the Group monitors its capital based on the gearing ratio, defined as the proportion between net debt and total capital.

Net interest-bearing debt is calculated by adding the total amount of loans (including the current and non-current portions as disclosed in the statement of financial position) and deducting all cash and cash equivalents. Total equity is calculated by adding Shareholders' equity (as shown in the statement of financial position), to interest-bearing net debt, and excluding treasury shares and non-controlling interests.

The Group calculates the gearing ratio as follows:

Amounts in Euros	2025	2024
Interest-bearing liabilities (Note 5.7)	833,858,339	903,977,752
Cash and cash equivalents (Note 5.9)	(130,229,469)	(286,628,866)
Net debt	**703,628,870**	**617,348,886**
Equity	1,413,128,875	1,356,089,184
Non-controlling interests (Note 5.6)	(389,845)	(360,347)
Equity, excluding treasury shares and non-controlling interests	**1,412,739,030**	**1,355,728,837**
Total Equity	**2,116,367,900**	**1,973,077,723**
Gearing	**33.25%**	**31.29%**

5.2. Share Capital and treasury shares

Navigator's Shareholders

The Navigator Company is a public company with its shares quoted on the Euronext Lisbon.

As at 31 December 2025, The Navigator Company, S.A.'s share capital of Euro 500,000,000 was fully subscribed and paid up and is represented by 711,183,069 shares without nominal value (31 December 2024: 711,183,069 shares).

As at 31 December 2025 and 2024, the Shareholders with qualified shareholdings in the Company's capital were as follows:

	2025		2024	
Entity	**No. of shares**	**%**	**No. of shares**	**%**
Semapa, SGPS, S.A.	498,042,299	70.03%	498,042,299	70.03%
Floating shares	213,140,770	29.97%	213,140,770	29.97%
	711,183,069	**100.0%**	**711,183,069**	**100.0%**

As at 31 December 2025 and 2024, Navigator did not hold any treasury shares.

Accounting policies

Ordinary shares are classified in Shareholders' equity.

Costs directly attributable to the issue of new shares or other equity instruments are reported as a deduction, net of taxes, from the proceeds of the issue.

Costs directly attributable to the issue of new shares or options for the acquisition of a new business are deducted from the amount issued.

When any Group company acquires shares of the parent company (treasury shares), the payment, which includes directly attributable incremental costs, is deducted from the Shareholders' equity attributable to the Company's equity holders until such time the shares are cancelled, reissued or sold.

When such shares are subsequently disposed or reissued, any proceeds, net of the directly attributable transaction costs and taxes, is directly reflected in the Shareholders' equity and not in profit or loss for the period.

5.3. Earnings per share

	2025	2024
Profit attributable to Navigator's shareholders (Euro)	**144,667,435**	**286,948,195**
Total number of shares issued	711,183,069	711,183,069
Weighted average number of shares	**711,183,069**	**711,183,069**
Basic earnings per share (Euro)	**0.203**	0.403
Diluted earnings per share (Euro)	**0.203**	0.403

Accounting policies

Basic earnings per share are determined based on the division of profits or losses attributable to the ordinary Shareholders of the Company by the weighted average number of common shares outstanding during the period.

For the purpose of calculating diluted earnings per share, the Company adjusts the profits or losses attributable to ordinary equity holders, as well as the weighted average number of outstanding shares for the purposes of all potential dilutive common shares.

5.4. Dividends and reserves allocated

Dividends and reserves allocated in the period

Amounts in Euros	Amount approved	Dividends per share (Euro)
Allocations in 2025		
Distribution of retained earnings	74,994,255	0.105
Atribuições em 2024		
Distribution of retained earnings	149,995,621	0.211
Distribution of early dividends	99,999,451	0.141

At the Annual General Meeting held on 29 May 2025, The Navigator Company, S.A. resolved to distribute dividends amounting to Euro 174,993,706, of which Euro 99,999,451 were paid to Shareholders on 9 January 2025 as an advance on 2024 profits, in accordance with the resolution of the Board of Directors of The Navigator Company, S.A. on 19 December 2024.

At the Annual Shareholders' Meeting of 24 May 2024, The Navigator Company, S.A. decided to distribute dividends in the amount of Euro 149,995,621.

Accounting policies

The distribution of dividends to equity holders is recognised as a liability in the Group's consolidated financial statements in the period in which the dividends are approved by the Shareholders at the General Shareholders Meeting and up until the time of their payment or, in the case of anticipated distributions, when approved by the Board of Directors.

5.5. Reserves and retained earnings

Amounts in Euros	2025	2024
Currency translation reserve	6,557,946	13,829,407
Fair value reserve	302,772	12,011,454
Legal reserve	100,000,000	100,000,000
Other reserves	(6,181,061)	(5,960,836)
Retained earnings	667,391,938	548,900,068
Reserves and retained earnings	**768,071,595**	**668,780,093**

Currency translation reserve – detail

Amounts in Euros	2025	2024
Navigator North América (USD)	9,411,118	13,491,391
Navigator Paper Mexico (MXN)	(192,229)	(192,140)
Navigator Middle East Trading DMCC (AED)	(13,850)	(4,275)
Navigator Egypt (EGP)	(4,068)	12,005
Navigator Paper Company UK (GBP)	2,051,188	(3,118,216)
Navigator Eurasia (TYR)	799	799
Navigator Afrique du Nord (MAD)	395	395
Navigator Paper Poland (PLN)	(2,897)	(2,897)
Portucel Moçambique (MZN)	(581,524)	718,714
Navigator Paper Southern Africa (ZAR)	(12,786)	5,602
Navigator Holding Tissue UK, Ltd (GBP)	(4,098,200)	2,918,029
	6,557,946	**13,829,407**

Fair value reserves – details

Amounts in Euros	2025			2024		
	Gross amount	**Tax**	**Net amount**	**Gross amount**	**Tax**	**Net amount**
Interest rate risk hedging	5,968,268	(1,521,908)	4,446,360	5,068,875	(1,343,252)	3,725,623
Foreign exchange risk hedging and other hedges	(5,561,863)	1,418,275	(4,143,588)	11,273,239	(2,987,408)	8,285,831
	406,405	**(103,633)**	**302,772**	**16,342,114**	**(4,330,660)**	**12,011,454**

Fair value reserves – movements

Amounts in Euros	2025	2024
Opening balance	**12,011,454**	**12,898,767**
Change in the fair value of derivative financial instruments (Note 8.2)	(15,935,709)	(1,526,544)
Deferred tax	4,227,027	639,231
Closing balance	**302,772**	**12,011,454**

The amount transferred from fair value reserves to profit or loss resulting from the settlement or maturity of hedging instruments is net of the following effects:

a) The amount transferred from fair value reserves to profit or loss resulting from the settlement or maturity of hedging instruments.

- Sales price hedging instruments, recognised under paper and pulp sales, which generated gains of Euro 15,091,281 (in 2024, the net negative impact of pulp and energy sales of Euro 5,714,356) (Note 2.1);
- Energy and gas purchase price hedging instruments, recorded under External Services and Supplies, generated losses of Euro 2,327,638 and gains of Euro 3,813,073 (in 2024, losses of Euro 6,775,518 and gains of Euro 11,997,819), respectively;
- Interest rate hedging instruments, which generated a positive impact of Euro 3,426,873 (in 2024 Euro 11,328,732) in net financial results (Note 5.10);

b) Negative changes in the fair value of hedging derivatives amounting to Euro 4,067,880 (in 2024 Euro 22,861,169).

Other reserves – details

Amounts in Euros	2025	2024
Transfer of legal reserve surplus to free reserves	9,790,475	9,790,475
Free reserves arising from the reduction of share capital not distributed	5,994	5,994
Adjustments to the application of 2014 profits (balance sheet bonus)	1,476	1,476
Incorporation of capital reserves	(6,316,931)	(6,316,931)
Acquisitions/Disposals of non-controlling interests	(9,662,075)	(9,441,850)
	(6,181,061)	**(5,960,836)**

In 2014, the Group signed agreements with IFC – Internacional Finance Corporation, a Subscription Agreement and a Put and Call option for the entry of this institution into the share capital of the subsidiary Portucel Moçambique, S.A., thus ensuring the construction phase of the Group's forestry project in Mozambique. In 2015, this Company performed a capital increase from MZM 1,000 million to MZM 1,680.798 million subscribing MZM 332,798 million corresponding to 19.98% of the capital at that date.

On 23 May 2018, the General Shareholders' Meeting decided to transfer the excess of the legal reserve in the amount of Euro 9,790,475 to free reserves as a result of the share capital reduction operation carried out on 4 October 2017.

In February 2019, there was a reduction in the subscribed, underwritten and paid-up capital of the shareholder The Navigator Company, S.A. to MZM 456,596,000, corresponding to 90.02% of the Company’s share capital, and the IFC’s holding was revised to MZM 50,620,000, corresponding to 9.98% of the Portucel Moçambique’s share capital.

On 19 December 2023, an addendum was made to the agreements initially signed with the IFC - International Finance Corporation, extending the date of entry of this institution into the capital of the subsidiary Portucel Moçambique, S.A. from 31 December 2023 to 31 December 2028.

In 2024, the Group considered that the put option on the shares of the subsidiary Portucel Moçambique, S.A. to The Navigator Company, S.A. by IFC – International Finance Corporation was expected to be exercised and recorded the amount of Euro 9,441,850 relating to that transaction under Other reserves, which is updated on an annual basis by the amount of accrued interest. As at 31 December 2025, this amounted to Euro 9,662,075.

Accounting policies

Fair value reserves

It corresponds to the accumulated change in fair value of derivative financial instruments classified as hedging instruments (Note 8.2), net of deferred taxes.

Changes related to derivatives are reclassified to profit or loss for the period (Note 5.10) as the hedged instruments affect profit or loss for the period. The fair value adjustments of financial investments recorded under this caption is not recycled to profit or loss.

Currency translation reserve

The currency translation reserve corresponds to the accumulated amount related to the settlement by the Group of the exchange rate differences resulting from the translation of the financial statements of the subsidiaries operating outside the Euro zone.

Legal reserve

The Portuguese commercial legislation prescribes that at least 5% of annual net profit must be transferred to the legal reserve, until this is equal to at least 20% of the share capital. This reserve cannot be distributed unless the company is liquidated. It may, however, be drawn on to absorb losses, after other reserves are exhausted, or incorporated in the share capital.

The legal reserve is constituted by its maximum amount in the periods presented.

Other reserves and Retained earnings

This caption corresponds to reserves available for distribution to Shareholders that were constituted through the appropriation of prior period's earnings, the reduction of share capital and other movements. The portion of the balance corresponding to the acquisition value of treasury shares held is not distributable (Note 5.2).

5.6. Non-controlling interests

Detail of non-controlling interests, by subsidiary

Amounts in Euros	% held	Equity 2025	Equity 2024	Net profit 2025	Net profit 2024
Raiz - Instituto de Investigação da Floresta e Papel	3.0%	389,845	360,347	25,522	36,018
Portucel Moçambique	0.00%	-	-	-	-
		389,845	**360,347**	**25,522**	**36,018**

Non-controlling interests are related to RAÍZ – Instituto de Investigação da Florestal e Papel, where the Group owns 97% of the capital and voting rights. The remaining 3% are owned by external associates.

In 2024, the Group recorded the exercise of the put option on Portucel Moçambique shares, representing 9.98% of the share capital, by IFC – International Finance Corporation, as stated in Note 5.5.

As at the reporting date, there are no rights of protection of non-controlling interests that significantly restrict the entity's ability to access or use assets and settle liabilities of the Group.

Movements of non-controlling interests

Amounts in Euros	2025	2024
Opening balance	**360,347**	**327,018**
Net profit for the period	25,522	36,018
Other comprehensive income	3,976	(2,689)
Closing balance	**389,845**	**360,347**

5.7. Interest-bearing liabilities

	2025			2024		
Amounts in Euros	**Non-current**	**Current**	**Total**	**Non-current**	**Current**	**Total**
Bond loans	525,000,000	-	525,000,000	547,500,000	100,000,000	647,500,000
Commercial paper	50,000,000	40,730,003	90,730,003	85,000,000	35,000,000	120,000,000
Bank loans	182,051,351	23,080,632	205,131,983	81,266,782	35,529,242	116,796,024
Charges with bond issues	(3,638,085)	-	(3,638,085)	(3,442,860)	-	(3,442,860)
Repayable grants	9,414,999	7,219,439	16,634,438	15,905,149	7,219,439	23,124,588
Debt securities and bank debt	**762,828,265**	**71,030,074**	**833,858,339**	**726,229,071**	**177,748,681**	**903,977,752**
Average interest rate, considering charges for annual fees and hedging operations			2.7%			2.4%

In 2025, the trend in financing was characterised by the raising of a significant volume of new long-term facilities (with maturities ranging between 5 and 7 years), amounting to Euro 540 million (Euro 325 million in bond loans, Euro 40 million in loans and Euro 175 million in commercial paper with underwriting commitment), all indexed to ESG-linked indicators, of which facilities totalling Euro 259 million remain undrawn. A substantial portion of this financing was undertaken with the aim of extending the average maturity of the debt portfolio, with net debt increasing by only Euro 86 million, despite the significant investment effort carried out during the year and the payment of Euro 175 million in dividends.

Among these facilities, particular note should be made of the signing of a new long-term financing agreement with the European Investment Bank (EIB) in the amount of Euro 40 million, representing the first tranche of a total financing package of Euro 80 million, intended to fund a portfolio of projects aimed at accelerating Navigator's decarbonisation plan.

In the final quarter of the year, the Group entered into Euro 175 million of Sustainability-Linked commercial paper facilities, with underwriting commitment, with maturities ranging between 5 and 7 years, providing increased flexibility in the mobilisation of debt.

These new long-term facilities contributed to the extension of the Group's average debt maturity, while also supporting the maintenance of a low financing cost for the Company. The conditions of the new-long term facilities are indexed to three ESG indicators already included in the Group's Sustainability Agenda and, in turn, aligned with the Sustainable Development Goals of the United Nations.

The repayable incentives include incentives from AICEP – Agência para o Investimento e Comércio Externo de Portugal, as part of a number of research and development projects, which includes the incentive under the investment agreement entered into with the subsidiary of the Navigator Tissue Aveiro, S.A. Group, for the construction of the new tissue mill in Aveiro. This agreement comprises a financial incentive in the form of a repayable grant, up to a maximum amount of Euro 42,166,636, without interest payment, with a grace period of two years, with the last refund taking place in 2027.

The maturity analysis of interest-bearing liabilities is presented in the Note 8.1.3 – Liquidity risk.

Interest-bearing liabilities - details

2025

Amounts in Euros	Amount	Outstanding amount	Maturity	Interest rate	Current	Non-current
Bond loans						
Navigator 2024-2029 SLB	50,000,000	50,000,000	junho 2029	Indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator 2024-2031 SLB	50,000,000	50,000,000	junho 2031	Indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator 2024-2031 SLB	50,000,000	50,000,000	outubro 2031	Fixed	-	50,000,000
Navigator 2024-2031 SLB	100,000,000	100,000,000	maio 2031	Indexed to Euribor, with swap to fixed rate	-	100,000,000
Navigator 2025-2032 SLB	100,000,000	100,000,000	junho 2032	Indexed to Euribor, with swap to fixed rate	-	100,000,000
Navigator 2025-2032 SLB	125,000,000	125,000,000	agosto 2032	Indexed to Euribor, with swap to fixed rate	-	125,000,000
Navigator 2025-2032 SLB	50,000,000	50,000,000	dezembro 2032	Indexed to Euribor	-	50,000,000
Navigator 2026-2033 SLB	50,000,000		junho 2033		-	
Fees	-	(3,638,085)	-		-	(3,638,085)
European Investment Bank (EIB)						
EIB Loan – Cacia	6,944,444	6,944,444	maio 2028	Fixed	2,777,778	4,166,666
EIB Loan – Figueira	20,000,000	20,000,000	fevereiro 2029	Fixed	5,714,286	14,285,714
EIB Loan – Biomass Boiler	21,607,143	21,607,143	março 2031	Fixed	3,928,571	17,678,572
EIB Loan – Recovery Boiler	115,000,000	115,000,000	junho 2037	Indexed to Euribor	-	115,000,000
EBI Loan	40,000,000	-	up to 12 years after repayment	Indexed to the cost of EIB funds, on disbursement	-	-
Commercial Paper Programme						
Commercial Paper Programme 175M	35,000,000	35,000,000	February 2026	Fixed	35,000,000	-
Commercial Paper Programme 65M ESG	3,250,000	-	February 2026	Indexed to Euribor	-	-
Commercial Paper Programme 75M	75,000,000	-	January 2026	Indexed to Euribor	-	-
Commercial Paper Programme 50M 2024-2030 - SL	50,000,000	50,000,000	maio 2030	Indexed to Euribor	-	50,000,000
Commercial Paper Programme 50M 2025-2030 - SL	50,000,000	5,730,003	outubro 2030	Indexed to Euribor (issues in EUR) / SONIA (issues in GBP)	5,730,003	-
Commercial Paper Programme 50M 2025-2030 - SL	50,000,000	-	dezembro 2030	Indexed to Euribor	-	-
Commercial Paper Programme 75M 2026-2033 - SL	75.000.000*	-		Indexed to Euribor	-	-
Loans						
Long-term ESG financing	30,000,000	30,000,000	janeiro 2031	Indexed to Euribor	-	30,000,000
Financial leasing	1,959,529	1,959,529	-	Indexed to SONIA	1,039,130	920,399
Repayable grants						
AICEP	16,634,438	16,634,438	-		7,219,439	9,414,999
Bank credit facilities						
Short-term facility 20M	20,450,714	-	-	Indexed to Euribor	-	-
Short-term facility 30M GBP	34,380,014	9,620,867	-	Indexed to BoE Bank Rate	9,620,867	-
	1,145,226,282	**833,858,339**			**71,030,074**	**762,828,265**

2024

Amounts in Euros	Amount	Outstanding amount	Maturity	Interest rate	Current	Non-current
Bond loans						
Navigator 2022-2028 ESG	150,000,000	150,000,000	June 2028	Indexed to Euribor, with swap to fixed rate	50,000,000	100,000,000
Navegador 2019-2026	50,000,000	50,000,000	janeiro 2026	Fixed rate	-	50,000,000
Navigator 2019-2025	10,000,000	10,000,000	março 2025	Indexed to Euribor, with swap to fixed rate	10,000,000	-
Navigator 2021-2026	12,500,000	12,500,000	abril 2026	Indexada à Euribor	2,500,000	10,000,000
Navigator 2020-2026	75,000,000	75,000,000	dezembro 2026	Indexed to Euribor, with swap to fixed rate	37,500,000	37,500,000
Navigator 2021-2026 ESG	100,000,000	100,000,000	agosto 2026	Indexed to Euribor, with swap to fixed rate	-	100,000,000
Navigator 2024-2029	50,000,000	50,000,000	junho 2029	Indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator 2024-2031	50,000,000	50,000,000	junho 2031	Indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator SLB 2024-2031	50,000,000	50,000,000	outubro 2031	Indexed to Euribor	-	50,000,000
Navigator 2024-2031 SLB	100,000,000	100,000,000	maio 2031	Indexed to Euribor	-	100,000,000
Fees	-	(3,442,861)	-		-	(3,442,861)
European Investment Bank (EIB)						
EIB Loan - Energy	-	-	December 2024	Indexed to Euribor	-	-
EIB Loan - Cacia	9,722,222	9,722,222	May 2028	Fixed rate	2,777,778	6,944,444
EIB Loan - Figueira	25,714,286	25,714,286	February 2029	Fixed rate	5,714,286	20,000,000
EIB Loan - Biomass Boiler	25,535,714	25,535,714	March 2031	Fixed rate	3,928,571	21,607,143
EIB Loan	115,000,000	-	up to 12 years after repayment	Indexed to the cost of EIB funds, on disbursement	-	-
Programa de Papel Comercial						
Commercial Paper Programme 175M	70,000,000	70,000,000	February 2026	Fixed rate	35,000,000	35,000,000
Commercial Paper Programme 65M ESG	19,500,000	-	February 2026	Indexed to Euribor	-	-
Commercial Paper Programme 75M	75,000,000	-	January 2026	Indexed to Euribor	-	-
Commercial Paper Programme 50M	50,000,000	-	December 2025	Indexed to Euribor	-	-
Commercial Paper Programme 50M 2024-2030	50,000,000	50,000,000	June 2030	Indexed to Euribor	-	50,000,000
Financiamentos						
Long-term loan	55,000,000	30,000,000	March 2031	Indexed to Euribor	-	30,000,000
Financial leasing	9,645,897	4,432,695	December 2027	Indexed to Libor	1,717,499	2,715,195
Repayable grants						
AICEP	23,124,589	23,124,588	-		7,219,439	15,905,150
Bank credit facilities						
Short-term facility 20M	20,450,714	-	-		-	-
Short-term facility 20M GBP	21,391,108	21,391,108	-	Indexed to Libor	21,391,108	-
	1,217,584,530	**903,977,752**			**177,748,681**	**726,229,071**

As at 31 December 2025, the average cost of issued debt, considering interest rate, the annual fees and hedging operations, was 2.7% (31 December 2024: 2.4%). At this date, 70% of the debt is remunerated at a fixed rate, either by direct contracting on this basis or by hedging the interest rate with derivative financial instruments (89% as at 31 December 2024).

At 31 December 2025, 90% of the Group's financing is linked to compliance with sustainability commitments (31 December 2024: 65%).

The repayment terms for the interest-bearing liabilities recorded as non-current are detailed as follows:

	Non-current loans	
Amounts in Euros	2025	2024
Non-current		
1 to 2 years	22,756,033	252,140,074
2 to 3 years	23,137,009	19,640,074
3 to 4 years	68,890,977	113,746,941
4 to 5 years	66,033,835	56,785,714
More than 5 years	585,648,496	287,359,128
	766,466,350	**729,671,931**
Fees	(3,638,085)	(3,442,860)
	762,828,265	**726,229,071**

As at 31 December 2025, the Group had contracted Commercial Paper Programs, contracted and undisbursed long-term financing, as well as available and undrawn credit facilities of Euro 307,729,858 (31 December 2024: Euro 310,163,917).

As at 31 December 2025 and 2024, the Group's interest-bearing net debt was as follows:

Amounts in Euros	2025	2024
Interest-bearing liabilities	833,858,339	903,977,752
Cash and cash equivalents (Note 5.9)	(130,229,469)	(286,628,866)
Interest-bearing net debt	**703,628,870**	**617,348,886**
Lease liabilities (Note 5.8)	132,529,668	111,736,900
Interest-bearing net debt with lease liabilities	**836,158,538**	**729,085,786**

Financial covenants in force

Ratio	Definition	Loans	Limit
Interest coverage	EBITDA 12M / Annual net interest	Bank	>= 4.5 - 5.5
Indebtedness	Interest-bearing debt / EBITDA 12M	Bank	<= 4.5
Net Debt / EBITDA	(Interest-bearing debt – Cash and cash equivalents) / EBTDA 12M	Bank Commercial Paper Bonds	<= 4.0 <= 4.0 - 5.0 <= 4.0

Based on the consolidated financial statements presented in this report, these ratios were as follows as at 31 December 2025 and 2024:

Ratio	2025	2024
Interest coverage	16.92	41.93
Indebtedness	2.22	1.65
Net Debt / EBITDA	1.87	1.13

The amounts presented in the table above exclude lease liabilities.

Considering the limits set out in the financing agreements, the Group is in compliance with the negotiated covenants. As at 31 December 2025 and 2024, the company presents a minimum safety margin above 80% on the fulfilment of its covenants.

Movements in liabilities of the Group's financing activities

Amounts in Euros	2025	2024
Balance as at 1 January	**903,977,752**	**659,344,463**
Payment of interest-bearing liabilities	(458,010,468)	(124,542,159)
Receipts from interest-bearing liabilities	395,730,003	352,162,243
Payment of repayable grants	(7,216,435)	(7,219,439)
Changes in financing cash flows	**(69,496,900)**	**220,400,645**
Exchange rate effect	**(1,153,573)**	**649,317**
Interest expenses	726,285	(103,281)
Changes in borrowing costs	(195,225)	(828,111)
Change in the perimeter	-	24,514,719
Other changes	**531,060**	**23,583,327**
Changes in interest-bearing debt	**(70,119,413)**	**244,633,289**
Gross interest-bearing debt	**833,858,339**	**903,977,752**

In 2025, cash inflows amounting to Euro 395,730,003 relate to a bank loan of Euro 115,000,000, three bond issues with maturity in 2032 totalling Euro 275,000,000, and a commercial paper issue amounting to Euro 5,730,003, all of which are ESG-linked debt (Sustainability-Linked).

Estimates and judgements

Commercial paper

The Group has several commercial paper programmes negotiated, of agreements with which it is frequent to carry out emissions with contractual maturity of less than one year but with revolving nature. Where the Group expects to roll over these loans, it presents them as non-current liabilities.

Accounting policies

Interest-bearing liabilities includes Bonds, Commercial Paper, bank loans and other financing.

Initial measurement

At fair value, net of transaction costs incurred.

Subsequent measurement

At amortised cost, using the effective interest rate method.

The difference between the repayment amount and the initial measurement amount is recognised in the income statement over the debt period under Interest expenses on other loans in Note 5.10 – Net financial results.

Fair value

The book value of short-term interest-bearing liabilities or loans contracted at variable interest rates are close to their fair value.

The fair value of interest-bearing liabilities that are remunerated at a fixed rate is disclosed in Note 8.3 – Financial assets and liabilities.

Disclosure

The Group shall classify a liability as current when:

a) it expects to settle the liability within the normal course of its operating cycle;
b) it holds the liability primarily for trading purposes;
c) the liability is due to be settled within twelve months after the reporting period; or
d) it does not have an unconditional right to defer settlement of the liability for at least twelve months after the reporting period.

5.8. Lease liabilities

Lease liabilities – Nature

	2025			2024		
Amounts in Euros	**Non-current**	**Current**	**Total**	**Non-current**	**Current**	**Total**
Forestry land	58,951,232	3,825,418	62,776,650	57,264,280	3,571,330	60,835,610
Buildings	266,724	626,670	893,394	874,505	595,254	1,469,759
Vehicles	3,937,957	2,422,970	6,360,927	4,878,286	2,422,257	7,300,543
Software licenses	-	-	-	-	7,537	7,537
Other lease liabilities	57,225,407	5,273,290	62,498,697	35,610,598	6,512,853	42,123,451
	120,381,320	**12,148,348**	**132,529,668**	**98,627,669**	**13,109,231**	**111,736,900**

Lease liabilities – Movements

Amounts in Euros	2025	2024
Balance as at 1 January	**111,736,900**	**69,996,821**
Change in the perimeter	-	40,087,211
Contract amortisation	(19,093,912)	(15,661,601)
New contracts	38,037,099	15,399,731
Interest expense	4,904,606	3,896,924
Exchange rate effect	(2,304,446)	991,670
Other changes	(750,579)	(2,973,856)
Total changes in related liabilities	**20,792,768**	**41,740,079**
Balance as at 31 December	**132,529,668**	**111,736,900**

Lease liabilities – Future liabilities

	2025			2024		
Amounts in Euros	**Maturing rents**	**Interest on liabilities**	**Present value of liabilities**	**Maturing rents**	**Interest on liabilities**	**Present value of liabilities**
Less than 1 year	6,863,102	5,285,246	12,148,348	8,979,261	4,129,971	13,109,232
1 to 2 years	5,772,982	4,871,653	10,644,635	8,889,165	3,663,989	12,553,154
2 to 3 years	6,570,388	4,431,483	11,001,871	6,181,341	3,241,953	9,423,294
3 to 4 years	6,065,690	3,986,420	10,052,110	5,558,231	2,901,466	8,459,697
4 to 5 years	5,773,064	3,557,497	9,330,561	4,835,706	2,580,681	7,416,387
More than 5 years	61,920,043	17,432,100	79,352,143	47,803,576	12,971,560	60,775,136
Present value of liabilities	**92,965,269**	**39,564,399**	**132,529,668**	**82,247,280**	**29,489,620**	**111,736,900**

For the periods ended 31 December 2025 and 2024, there were no changes in the liability arising from financing activities, including changes arising from cash flows and/or other changes in lease liabilities.

Accounting policies

At the start date of the lease, the Group recognises lease liabilities measured at the present value of future lease payments, which include fixed payments less lease incentives, variable lease payments, and amounts expected to be paid as residual value. Lease payments also include the price of exercise of renewal options reasonably certain to be exercised by the Group or lease termination penalty payments if the lease term reflects the Group's option to terminate the agreement.

In calculating the present value of future lease payments, the Group uses an incremental financing rate if the implied interest rate on the lease transaction is not easily determinable.

Subsequently, the value of the lease liabilities is increased by the interest amount (Note 5.10 Net Financial Results) and decreased by the lease payments (rents).

5.9. Cash and cash equivalents

Amounts in Euros	2025	2024
Cash	41,486	36,915
Short-term bank deposits	70,187,983	34,591,951
Other short-term investments	60,000,000	252,000,000
	130,229,469	**286,628,866**

Other short-terms investments records amounts invested by Navigator in short-term, highly liquid deposits and issuers with adequate ratings.

As at 31 December 2025 and 2024, there are no significant balances of cash and cash equivalents that are subject to restrictions on use by the Group.

Accounting policies

Cash and cash equivalents include cash, bank accounts and other short-term investments with an initial maturity of up to 3 months, which can be mobilised immediately without any significant risk in value fluctuations.

For cash flow statement purposes, this caption also includes bank overdrafts, which are presented in the statement of financial position as a current liability, under the caption Interest-bearing liabilities (Note 5.7).

5.10.Net financial results

Amounts in Euros	2025	2024
Interest paid on debt securities and bank debt	(23,673,122)	(25,410,899)
Interest earned on other financial liabilities at amortised cost	(2,044,441)	(2,530,301)
Commissions on loans and expenses with the opening of credit facilities	(3,074,276)	(2,023,032)
Interest paid using the effective interest method	**(28,791,839)**	**(29,964,232)**
Interest paid on lease liabilities (Note 5.8)	(4,904,606)	(3,896,924)
Financial expenses related to the Group's capital structure	**(33,696,445)**	**(33,861,156)**
Financial discount on other liabilities	(1,268,524)	-
Favourable / (Unfavourable) exchange rate differences	(5,116,548)	(4,678,314)
Gains / (Losses) on financial instruments - hedging (Note 8.2)	-	(2,530,279)
Other financial expenses and losses	(1,422,720)	(1,398,906)
Financial expenses and losses	**(41,504,237)**	**(43,215,938)**
Interest earned on financial assets at amortised cost	3,160,930	4,809,504
Gains on financial instruments - hedging (Note 8.2)	3,426,873	11,328,732
Gains / (Losses) on financial instruments - trading (Note 8.2)	1,977,198	-
Gains on compensatory interest	996,166	490,852
Financial income and gains	**9,561,167**	**17,376,371**
Net financial results	**(31,943,070)**	**(25,839,567)**

Net financial losses amounted to Euro 31,943,070 (31 December 2024: Euro 25,839,567, negative). This evolution was primarily due to higher financing costs, reflecting an increase of Euro 185 million in the average debt volume compared to the same period last year. Nevertheless, the average cost remains low (+0.3% compared to the same period last year), despite a significant increase in the average debt maturity (+1.5 years compared to the same period last year). In turn, despite the significant foreign exchange volatility, the management of foreign exchange risks led to an improvement compared to the same period last year, amounting to Euro 4,069,243, reflecting a lower net cost arising from exchange rate differences.

The trend in net financial results, although hampered by a higher level of indebtedness, was achieved at competitive costs, with spreads over the benchmark rate below historical levels. However, debt negotiated from June 2024 onwards and during 2025 presents higher overall costs than the debt it replaced, as the latter had been contracted together with financial hedging instruments, during a period of historically low interest rates.

Net cost of capital structure

Amounts in Euros	2025	2024
Interest paid on fixed rate loans	(3,650,030)	(2,803,140)
Interest paid on variable rate loans	(4,639,759)	(2,309,463)
Interest paid on variable rate financing and covered by IRS	(15,383,333)	(20,298,296)
Interest rate hedges - IRS (Note 8.2)	3,426,873	11,328,732
Commissions on loans and expenses with the opening of credit facilities	(3,074,276)	(2,023,031)
	(23,320,525)	**(16,105,198)**
Interest paid on lease liabilities	(4,904,606)	(3,896,924)
Interest paid on other interest-bearing liabilities	(2,044,441)	(2,530,301)
Interest earned on financial assets at amortised cost	3,160,930	5,556,787
Net cost of capital structure	**(27,108,642)**	**(16,975,636)**

Cost of Financing Operations

Amounts in Euros	2025	2024
Interest paid on debt securities and bank debt	(23,673,122)	(25,410,899)
Commissions on loans and expenses with the opening of credit facilities	(3,074,276)	(2,023,032)
Gains on financial instruments - hedging (Note 8.2)	3,426,873	11,328,732
Cost of Financing Operations	**(23,320,525)**	**(16,105,199)**

Exchange Rate Impact

Amounts in Euros	2025	2024
Unfavourable exchange rate differences	(5,116,548)	(4,678,314)
Gains / (Losses) on foreign exchange derivatives - trading	1,977,198	(2,530,279)
Resultados Cambiais	**(3,139,350)**	**(7,208,593)**

Accounting policies

The Group classifies as Financial income the income and gains resulting from treasury management activities such as: i) interest obtained from the application of cash surplus; and ii) changes in the fair value in derivative financial instruments negotiated to hedge interest rate and exchange rate risk on loans, regardless of the formal designation of hedge.

6. Income tax

6.1. Income tax for the period

6.1.1. Income tax recognised in the consolidated income statement

Amounts in Euros	2025	2024
Current tax	36,086,551	92,286,353
Changes in uncertain tax positions in the period	(3,602,832)	(11,603,585)
CESE	(58,407)	-
Deferred tax (Note 6.2)	(1,331,484)	(14,636,752)
	31,093,828	**66,046,016**

As at 31 December 2025, current tax includes Euro 28,496,166 (31 December 2024: Euro 81,337,182) regarding the liability created under the aggregated income tax regime of The Navigator Company, S.A. in Portugal, and is as follows by country:

Amounts in Euros	2025	%	2024	%
Portugal	28,496,166	78.97%	81,638,728	88.46%
Spain	4,939,835	13.69%	6,916,300	7.49%
United States of America	1,502,481	4.16%	2,754,763	2.99%
Ireland	369,133	1.02%	744,469	0.81%
France	377,209	1.05%	85,073	0.09%
United Kingdom	198,525	0.55%	78,999	0.09%
Other	203,202	0.56%	68,021	0.07%
	36,086,551	**100.00%**	**92,286,353**	**100.00%**

As at 31 December 2025 and 2024, the caption Change in uncertain tax positions in the period reflects the net effect of the excess/insufficiency of tax estimates, the favourable outcome of some cases related to matters with high uncertainty, as well as requests for binding information, claims to the Portuguese Tax Authorities and jurisprudence of the courts.

There have not been, nor are any expected changes arising from variations in the rate used to determine the expected tax amount.

Nominal tax rate

In the periods presented, the Group considers a nominal tax rate in Portugal of 26.5%, resulting from the tax legislation as follows:

	2025	2024
Portugal		
Nominal income tax rate	20.0%	21.0%
Municipal surcharge	1.5%	1.5%
	21.5%	**22.5%**
State surcharge - on the share of taxable profits between Euro 1,500,000 and Euro 7,500,000	3.0%	3.0%
State surcharge - on the share of taxable profits between Euro 7,500,000 and Euro 35,000,000	5.0%	5.0%
State surcharge - on the share of taxable profits above Euro 35,000,000	9.0%	9.0%

Reconciliation of the effective income tax rate for the period

Amounts in Euros	2025	2024
Profit before income tax	**175,786,785**	**353,030,229**
Expected tax at nominal rate (2025: 20% ; 2024: 21%)	35,157,357	74,136,348
Municipal surcharge (2024: 1.18% ; 2023: 1.48%)	2,066,616	5,220,845
State surcharge (2024: 3.33% ; 2023: 4.83%)	5,854,661	17,058,507
Income tax resulting from the applicable tax rate	**43,078,634**	**96,415,700**
Nominal tax rate for the period	**24.5%**	**27.3%**
Differences (a)	(5,361,850)	(5,995,539)
Changes in estimates relating to prior periods	-	(1,573,521)
Changes in uncertain tax positions in the period	(3,602,832)	(11,603,585)
CESE	(58,407)	-
Carrying forward tax losses from previous periods	(469,329)	-
Tax benefits	(2,677,734)	(11,288,005)
Autonomous taxation	1,160,487	752,676
Change in tax rate	(975,141)	(661,710)
	31,093,828	**66,046,016**
Effective tax rate	**17.7%**	**18.7%**

(a) This amount concerns mainly:

	2025	2024
Capital gains/ (losses) for tax purposes	(34,957,214)	1,964,267
Capital gains/ (losses) for accounting purposes	30,652,850	(2,281,507)
Taxable provisions and impairment	(4,755,660)	4,139,158
Tax benefits	(1,337,723)	(9,179,825)
Post-employment benefits	2,280,816	(2,065,106)
Incentive to capitalise companies	(5,273,873)	(17,347,915)
Deferred taxes relating to right-of-use assets and liabilities	-	(6,034,371)
International economic double taxation	-	13,970,336
Other	(6,842,591)	(4,966,998)
	(20,233,395)	**(21,801,961)**
Tax effect (2025: 26.5%; 2024: 27.5%)	**(5,361,850)**	**(5,995,539)**

6.1.2. Income tax recognised in the consolidated statement of financial position

Amounts in Euros	2025	2024
Assets		
Corporate Income Tax - IRC	11,241,191	-
Amounts pending repayment	29,399,807	20,621,461
	40,640,998	**20,621,461**
Liabilities		
Corporate Income Tax - IRC	288,801	27,868,324
Additional tax liabilities (IRC)	17,344,266	13,470,045
	17,633,067	**41,338,369**

Detail of Corporate Income Tax - IRC (net)

Amounts in Euros	2025	2024
Income tax for the period	36,086,551	92,286,353
Payments on account, special and additional payments on account	(54,189,680)	(68,520,255)
Withholding tax recoverable	(3,577,285)	(1,893,645)
Corporate Income Tax payable/ (repayable) from previous years	10,409,640	7,209,171
Other payables/ (receivables)	318,384	(1,213,300)
	(10,952,390)	**27,868,324**

The amounts of corporate income tax paid in the period are detailed as follows:

Amounts in Euros	2025	2024
Payment/ (Repayment) of IRC for the previous period	19,094,636	(8,824,662)
Payments on account, special and additional payments on account	54,189,681	68,520,255
Withholding tax	3,577,285	1,893,645
Repayments of tax proceedings decided in favour of the Group	(1,387,340)	(2,961,843)
Payments of additional tax liabilities	-	2,467,535
Income tax paid/ (received)	**75,474,262**	**61,094,930**

Amounts pending repayment

Amounts in Euros	2025	2024
2005 Corporate Income Tax (RETGS) – Proceeding 1259/ 09.3BESNT (Note 10.3)	13,886,728	13,886,728
2015 Proceeding – Proceeding 21/22.2BALSB	3,701,107	5,364,441
Aggregate Corporate Income Tax 2018 - Proceeding 525/13.4BEALM	1,457,205	-
RFAI 2010 to 2012 - compensatory interest	494,856	494,856
2016 Corporate Income Tax – Navigator Tissue Ródão – CAAD Proceeding 575/2020	861,866	861,866
2018 Corporate Income Tax (RETGS) - General Anti-Abuse Clause – Proceeding 648/23.5BEALM	8,984,475	-
Other	13,570	13,570
	29,399,807	**20,621,461**

The movements in the period are detailed as follows:

Amounts in Euros	2025	2024
Balance at the beginning of the period	**20,621,461**	**18,385,534**
Increases	10,441,680	5,364,441
Payments / (receipts)	(1,387,340)	(2,961,843)
Adjustments	(275,994)	-
Reversals	-	(166,671)
	29,399,807	**20,621,461**

Uncertain tax positions- Liabilities

Amounts in Euros	2025	2024
Balance at the beginning of the period	**13,470,045**	**18,100,389**
Increases	8,820,889	3,864,026
Payments / (receipts)	-	-
Transfer	(2,849,567)	(6,451,126)
Reversals	(2,097,101)	(2,043,244)
Changes in the period	**3,874,221**	**(4,630,344)**
	17,344,266	**13,470,045**

Taxes paid in litigation

As at 31 December 2025 and 2024, the additional tax assessments that are already paid and contested, not recognised in assets, refer to the Navigator Group and are summarised as follows:

Amounts in Euros	2025	2024
2006 Aggregate Corporate Income Tax - Proceeding 909/11.6 BEALM (Note 10.3)	8,150,146	8,150,146
2015 Corporate Income Tax – Navigator Tissue Ródão, S.A. - Proceeding f235/23.8BECTB	7,586,361	7,586,361
Aggregate Corporate Income Tax 2018 - Proceeding 648/23.5BEALM	-	8,014,795
Aggregate Corporate Income Tax 2018 - Proceeding 525/13.4BEALM	-	1,457,205
2020 Corporate Income Tax - Proceeding 357/2025	1,523,457	-
State Surcharge 2015 II – Proceeding 453/23.9BEALM	-	6,970,541
State Surcharge 2016 – Proceeding 457/21.6BEALM	-	3,761,397
State Surcharge 2017 – Proceeding 456/21.8BEALM	8,462,724	8,462,724
State Surcharge 2019 – Proceeding 557/23.8BEALM	2,466,974	2,466,974
State Surcharge 2020 – Proceeding 26/24.9BEALM	5,183,000	5,183,000
State Surcharge 2021 – Proceeding 702/24.6BEALM	6,154,906	6,154,906
	39,527,568	**58,208,049**

Estimates and judgements

The Group recognises liabilities for additional tax assessments that may result from reviews by the tax authorities of the different countries where the Group operates. When the outcome of these situations is different from the amounts initially recorded, the differences will have an impact on income tax in the period in which they occur.

In Portugal, annual income statements are subject to review and possible adjustment by the tax authorities for a period of 4 years. However, if tax losses are presented, they may be subject to review by the tax authorities for a period of 6 years. In other countries in which the Group operates, these periods are different, usually higher.

The Board of Directors considers that any corrections to those declarations as a result of reviews/inspections by the Portuguese Tax Authorities will not have a significant impact in the consolidated financial statements as at 31 December 2025, although the periods up to and including 2021 have already been reviewed.

As at 31 December 2025, if the effective tax rate corresponded to the nominal rate of 26.5% (27.5% as at 31 December 2024), there would be an increase in expenses with income taxes in the amount of Euro 15,489,670 (31 December 2024: Euro 31,037,297).

Uncertain tax positions

The amount of assets and liabilities recorded for tax proceedings arises from an assessment made by the Group, as at the date of the consolidated statement of financial position, regarding potential differences of understanding with the Tax Authorities, considering the developments in tax matters.

The Group, in relation to the measurement of uncertain tax positions, considers the provisions of IFRIC 23 – Uncertainty over Income Tax Treatments, namely the measurement of risks and uncertainties in the definition of the best estimate of the expense required to settle the obligation, by weighing all the possible results that are controlled by them and their associated probabilities.

Pillar Two Model Rules - OECD

The Navigator Group is subject to the OECD Pillar Two model rules from 1 January 2024. It has applied the exception to the recognition and disclosure of information on deferred tax assets and liabilities related to Pillar Two income taxes, as provided for in the amendments to IAS 12.

Based on the analysis performed as at the date of this report, no significant impacts arising from the introduction of the Pillar Two regime were identified, as the majority of the jurisdictions in which the Group operates are subject to nominal tax rates above 15%, in line with the current understanding of the interpretation of the new rules.

Accounting policies

Current income tax is calculated based on net profit, adjusted in conformity with tax legislation in force at the statement of consolidated financial position date.

Taxation group

In Portugal, the Navigator Group is subject to the special tax regime for groups of companies (RETGS), comprising companies in which the shareholding is equal to or more than 75% and which meet the conditions laid down in articles 69 and following of the Corporate Income Tax Code (IRC Code).

These companies included in the RETGS calculate income taxes as if they were taxed independently. Liabilities are recognised as due to the controlling company of the tax business Group, currently The Navigator Company, S.A. which is responsible for the Group's overall assessment and payment of the corporate income tax. Where there are gains on the use of this regime, these are recorded as income in the controlling company's financial statements.

In 2018, a tax group was also established in Spain, which includes the three subsidiaries of the group based in that country and owned by Bosques do Atlântico, S.L., the controlling company in the tax group.

6.2. Deferred taxes

Movements in deferred taxes

Amounts in Euros	As at 1 January 2025	Income Statement		Equity	Exchange rate adjustment	As at 31 December 2025
		Increases	Decreases	Increases/ Decreases		
Temporary differences originating deferred tax assets						
Tax losses carried forward	59,614,137	1,138,025	(495,035)	-	(2,957,510)	57,299,617
Provisions and impairment losses taxed	13,851,147	1,526,726	(5,444,723)	-	-	9,933,150
Adjustment of property, plant and equipment	19,207,012	18,589,842	(4,182,086)	-	-	33,614,768
Deferred capital gains (intra-group)	28,565,595	-	(24,519,722)	-	-	4,045,873
Appreciation of biological assets	28,116,466	1,339,730	(28,116,466)	-	-	1,339,730
Lease liabilities relating to right-of-use assets	74,717,190	5,752,864	(2,953,575)	-	(85,333)	77,431,146
Other temporary differences	2,703,693	356,382	(166,373)	-	(15,363)	2,878,339
	226,775,240	**28,703,569**	**(65,877,980)**	**-**	**(3,058,206)**	**186,542,623**
Temporary differences originating deferred tax liabilities						
Pensions and other post-employment benefits	(697,958)	33,532	1,468,266	(8,741,499)	-	(7,937,659)
Financial instruments	(16,342,114)	-	-	15,935,709	-	(406,405)
Appreciation of biological assets	(7,849,765)	(1,201,640)	-	-	-	(9,051,405)
Adjustment of property, plant and equipment	(294,201,945)	(9,048,641)	29,049,913	-	1,744,676	(272,455,997)
Fair value calculated in business combinations	(131,857,791)	-	12,178,758	-	4,709,960	(114,969,073)
Government grants	(2,902,778)	-	329,749	-	-	(2,573,029)
Right-of-use assets	(68,093,592)	(1,177,467)	2,956,790	-	-	(66,314,269)
Other temporary differences	(120,601)	(873,908)	-	-	6,001	(988,508)
	(522,066,544)	**(12,268,124)**	**45,983,476**	**7,194,210**	**6,460,637**	**(474,696,345)**
Deferred tax assets	59,110,851	7,663,818	(17,384,221)	-	(769,079)	48,621,369
Effect of the change in tax rate	-	-	(985,954)	-		(985,954)
Deferred tax assets	**59,110,851**	**7,663,818**	**(18,370,175)**	**-**	**(769,079)**	**47,635,415**
Deferred tax liabilities	(135,938,603)	(3,072,109)	12,021,583	1,906,468	1,615,158	(123,467,503)
Effect of the change in tax rate			3,088,367	74,712		3,163,079
Deferred tax liabilities	**(135,938,603)**	**(3,072,109)**	**15,109,950**	**1,981,180**	**1,615,158**	**(120,304,424)**

Amounts in Euros	As at 1 January 2024	Income Statement		Equity	Exchange rate adjustment	As at 31 December 2024
		Increases	Decreases	Increases/ Decreases		
Temporary differences originating deferred tax assets						
Tax losses carried forward	52,846	10,330,494	(8,763,724)	-	1,497,935	59,614,137
Provisions and impairment losses taxed	16,674,924	3,399,158	(6,222,935)	-	-	13,851,147
Adjustment of property, plant and equipment	32,384,050	3,369,216	(16,546,254)	-	-	19,207,012
Deferred capital gains (intra-group)	11,750,244	19,587,315	(2,771,964)	-	-	28,565,595
Appreciation of biological assets	24,904,297	3,212,169	-	-	-	28,116,466
Conventional return on capital	280,000	-	(280,000)	-	-	-
Lease liabilities relating to right-of-use assets	-	74,127,963	-	-	-	74,717,190
Other temporary differences	-	2,688,330	-	-	15,363	2,703,693
	86,046,361	**116,714,645**	**(34,584,877)**	**-**	**1,513,298**	**226,775,240**
Temporary differences originating deferred tax liabilities						
Pensions and other post-employment benefits	(795,430)	(27,809)	(31)	125,312	-	(697,958)
Financial instruments	(18,072,331)	-	-	1,526,544	-	(16,342,114)
Appreciation of biological assets	(3,519,844)	(4,329,921)	-	-	-	(7,849,765)
Adjustment of property, plant and equipment	(286,279,805)	(2,286,008)	30,589,642	-	(880,249)	(294,201,945)
Fair value calculated in business combinations	(39,840,800)	-	10,301,191	-	(2,538,614)	(131,857,791)
Government grants	(3,714,470)	-	424,209	-	-	(2,902,778)
Right-of-use assets	-	(68,093,592)	-	-	-	(68,093,592)
Other temporary differences	-	-	-	-	(3,065)	(120,601)
	(352,222,680)	**(74,737,330)**	**41,315,011**	**1,651,856**		**(422,066,544)**
Deferred tax assets	23,653,501	31,624,928	(9,287,124)	-	378,325	60,641,083
Effect of the change in tax rate	-	-	(1,530,232)	-	-	(1,530,232)
Deferred tax assets	**23,653,501**	**31,624,928**	**(10,817,356)**	**-**		**59,110,851**
Deferred tax liabilities	(95,856,013)	(20,539,643)	11,036,624	510,271	(855,484)	(139,417,456)
Effect of the change in tax rate			3,332,199	146,654		3,478,853
Deferred tax liabilities	**(95,856,013)**	**(20,539,643)**	**14,368,823**	**656,925**	**(855,484)**	**(135,938,603)**

In measuring deferred taxes as at 31 December 2025, the tax rates expected to apply when the temporary differences reverse (when the asset is realised or the liability is settled) were used, based on the tax legislation in force.

For companies in Portugal, a tax rate of 25.50% (26.5% as at 31 December 2024) was applied, following the 1

percentage point reduction in the Corporate Income Tax rate, in accordance with Law 64/2025 of 7 November, which amended the Corporate Income Tax Code (CIRC) by reducing the general tax rates. Moreover, deferred taxes for companies in the United Kingdom and Spain were calculated at a rate of 25%.

Accounting policies

Deferred tax is calculated based on the liability of the consolidated financial position on the temporary differences between the book values of the assets and liabilities and their respective tax base. To determine the deferred tax, the tax rate expected to be in force in the period in which the temporary differences will be reversed is used.

Deferred tax assets are recognised whenever there is a reasonable likelihood that future taxable profits will be generated against which they can be offset. Deferred tax assets are revised periodically and decreased, whenever it is likely that tax losses will not be used.

Deferred taxes are recorded as an income or expense for the year, except where they result from amounts recorded directly under equity, situation in which deferred tax is also recorded under the same caption. Tax benefits attributed to the Group regarding its investment projects are recognised through the income statement as there is sufficient taxable income to allow its use.

7. Payroll

7.1. Payroll costs

Amounts in Euros	2025	2024
Remuneration of Corporate Bodies - fixed (Note 7.3)	3,280,959	3,350,825
Remuneration of Corporate Bodies - variable	4,042,894	2,691,151
Other remuneration	158,567,369	151,235,286
Social Security contributions	32,021,626	28,914,957
Post-employment benefits (Note 7.2.4)	2,394,393	1,643,708
Other payroll costs	17,394,229	15,944,227
Payroll costs	**217,701,470**	**203,780,154**

Overall, the increase in Payroll costs is due to the acquisition of the Navigator Tissue UK Group, which was consolidated in May 2024, with an impact of Euro 22,836,551 as at 31 December 2025, compared to Euro 14,213,413 in December 2024.

Number of employees by segment at the end of the period

	2025	2024	Var. 25/24
Market pulp	312	295	17
UWF	1,777	1,782	(5)
Tissue	1,014	1,036	(22)
Corporate	816	838	(22)
	3,919	**3,951**	**(32)**

Number of employees by geographical segment at the end of the period

	2025	2024	Var. 25/24
Portugal	3,195	3,166	29
Rest of Europe	604	644	(40)
Mozambique	107	128	(21)
North America	8	8	-
Africa and Middle East	5	5	-
	3,919	**3,951**	**(32)**

Accounting policies

Short-term employee benefits

Acquired rights - holidays and holiday allowance

In accordance with the collective labour agreement applicable to The Navigator Company, S.A. as well as under the agreement celebrated with the Labour Unions, the Group companies are entitled to a 25 working days leave, as well as to a month's holiday allowance. Moreover, employees who work continuous shifts for more than 25 or 30 years get one or two additional days' holiday, respectively.

Productivity bonus

In 2022, the Group introduced a Productivity bonus in addition to the normal bonus paid to employees. The aim of this bonus is to focus on increasing productivity and profitability, which are critical and fundamental prerequisites for continued investment in business growth and sustainable improvements in salaries and benefits. Thus, the Productivity Bonus sets the achievement of production levels at challenging thresholds corresponding to different levels of remuneration, based on a basic monthly salary.

Bonuses

According to the current Performance Management System (*Sistema de Gestão de Desempenho*), employees have the right to a bonus, based on annually defined objectives. The entitlement of this bonus is usually acquired in the year preceding its payment.

These liabilities are recorded in the year in which the Employees acquire the respective right, irrespective of the date of payment, whilst the balance payable at the date of the consolidated statement of financial position is shown under the caption Current payables.

Benefits arising from termination of employment

The benefits arising from termination of employment are recognised when the Group can no longer withdraw the offer of such benefits or in which the Group recognises the cost of restructuring under the provisions recording. Benefits due more than 12 months after the end of the reporting period are discounted to their present value.

7.2. Employee benefits

7.2.1. Introduction

Some Group companies grant their Employees post-retirement benefits, either in the form of defined benefit plans or in the form of defined contribution plans.

The plans are funded through a closed pension fund, managed by an external entity, which is also responsible for the management of the assets of the defined contribution pension plans, and which subcontracts the management of the assets of the defined benefit pension plans to other asset management entities.

A. Pension Plan – Defined benefit

The Group has responsibilities with post-employment benefit plans for a reduced group of Employees who have chosen to maintain the Defined Benefit Plan (The Navigator Company) or who have chosen to maintain a Safeguard Clause, the latter following the conversion of their plan into a Defined Contribution Plan (The Navigator Company). This clause grants the Employee, at the date of retirement, the option to receive a pension payment in accordance with the provisions of the Defined Benefit Plan.

For those who choose to activate the Safeguard Clause, the accumulated balance in the Defined Contribution Plan (*Conta* 1) will be used to finance the liability of the Defined Benefit Plan.

B. Pension Plan – Defined contribution

As at 31 December 2025, three Defined Contribution plans were in force covering 3,276 employees (2024: 3,278 Employees) (Note 7.2.3).

Defined benefit plan

Policy for managing the risk associated with defined benefit plans

The Group's exposure to risk is limited to the number of existing beneficiaries and will tend to decrease, since there are no defined benefit plans open to new employees in the Group.

The most significant risks to which the Group is exposed through defined benefit plans include:

i. Risk of change in the longevity of participants.

ii. Market rate variation risk – rate variation impacts the rate used to discount liabilities (technical interest rate) which is based on yield curves of highly rated bonds with maturities similar to the liabilities' expiry dates and the fixed rate of return of the assets. The Group uses yield curves in order to monitor the evolution of rates and performs sensitivity analyses of interest rate variations with the aim of foreseeing and preventing the consequent impact on the fund's funding level.

iii. Risk of change in the wage and pension growth rate.

iv. Return on the fund's financial assets – the Group closely monitors the evolution of the fund's assets, as well as the evolution of the main financial market indicators, revisiting the investment policy approved for the management of the assets whenever justifiable, and at least every three years. The investment policy is aligned with a conservative view of asset management and defined on the basis of the responsibilities to be financed by the fund.

The Group aims to fund at least 90% of its liabilities, thereby mitigating the risks referred to above.

Net liabilities

Net liabilities reflected in the consolidated statement of financial position and the number of beneficiaries of the defined benefit plans in force in the Group are detailed as follows:

	2025		2024	
Amounts in Euros	**No. of Beneficiaries**	**Amount**	**No. of Beneficiaries**	**Amount**
Past service liabilities				
Active employees, including individual accounts	277	38,156,476	301	43,344,735
Alumni	106	14,970,532	114	17,567,947
Retired employees	678	98,705,712	662	98,711,371
Market value of pension funds		(161,188,224)		(160,971,371)
Total net liabilities	**1,061**	**(9,355,504)**	**1,077**	**(1,347,318)**

It is the Navigator Group’s intention to use the surplus funding identified in the defined benefit plans to finance any future increases in liabilities.

Historical information - last five years

Amounts in Euros	2021	2022	2023	2024	2025
Present value of liabilities	191,002,589	157,269,646	158,256,875	159,624,053	151,832,720
Fair value of assets and Reserve account	185,327,671	154,433,916	159,034,022	160,971,371	161,188,224
Surplus/ (deficit)	**(5,674,918)**	**(2,835,730)**	**777,147**	**1,347,318**	**9,355,504**

In 2025, the value of liabilities fell significantly as a result of:

a) An increase in the discount rate from 3.5% to 4.22%, which led to a reduction in liabilities of Euro 13,321,373;

b) A revision of the mortality table from TV88/90 to TV88/90-1, resulting in an increase in liabilities of Euro 6,033,166.

Evolution of defined benefit plan liabilities

2025	Opening balance	Current service cost	Interest expense	Actuarial deviations	Payments performed	Closing balance
Amounts in Euros						
Pensions with Autonomous Fund	159,624,053	21,343	5,453,880	(5,438,352)	(7,828,204)	151,832,720
	159,624,053	**21,343**	**5,453,880**	**(5,438,352)**	**(7,828,204)**	**151,832,720**

2024	Opening balance	Current service cost	Interest expense	Actuarial deviations	Payments performed	Closing balance
Amounts in Euros						
Pensions with Autonomous Fund	158,256,875	20,101	5,414,858	3,243,001	(7,310,782)	159,624,053
	158,256,875	**20,101**	**5,414,858**	**3,243,001**	**(7,310,782)**	**159,624,053**

The expected average duration of the defined benefit liabilities is 12.4 years (2024: 12.5 years).

Funds

Funds allocated to the defined benefit pension plans – evolution

Amounts in Euros	2025	2024
Opening balance	**160,971,371**	**159,034,022**
Allocations for the period	-	-
Expected net income for the period	4,696,205	5,441,354
Remeasurement	3,348,852	3,806,777
Pensions paid	(7,828,204)	(7,310,782)
Closing balance	**161,188,224**	**160,971,371**

The pension fund assets allocated to the defined benefit plan are managed by the following entities:

Amounts in Euros	2025	2024
Defined benefits and *Conta 1*:		
AGEAS - Pensões	128,516	(51,992)
Schroders	55,527,703	55,790,911
Santander AM	55,729,149	56,467,629
Julius Baer	49,802,856	48,764,823
Total Defined Benefits and *Conta 1*	**161,188,224**	**160,971,371**

Funds allocated to defined benefit plans - composition of assets

Amounts in Euros	2025	%	2024	%
Securities listed in the market				
Bonds	82,059,861	50.91%	98,435,081	61.15%
Shares	43,563,891	27.03%	41,216,140	25.60%
Public debt	28,212,948	17.50%	15,406,040	9.57%
Liquidity	1,491,603	0.93%	1,260,572	0.78%
Other short-term investments	5,859,921	3.64%	4,653,538	2.89%
	161,188,224	**100.00%**	**160,971,371**	**100.00%**

The pension fund portfolios do not include any assets of the Group.

7.2.3. Defined contributions plan

As at 31 December 2025 and 2024, three defined contribution plans were in force on behalf of Employees.

The assets of the pension fund that finance the defined contribution plans are under the management of the AGEAS, as detailed below:

Amounts in Euros	No. of Beneficiaries	Profitability %	2025	No. of Beneficiaries	Profitability %	2024
Definied Contribution (Ageas Pensões):						
Defensive sub-fund	123	3.34%	7,077,298	112	3.34%	5,608,582
Conservative sub-fund	395	5.20%	14,285,489	408	5.20%	15,773,907
Dynamic sub-fund	804	8.54%	16,982,457	771	8.54%	15,999,063
Aggressive sub-fund	1,954	11.42%	7,740,791	1,987	11.42%	7,209,476
Total Defined Contribution	3,276		**46,086,035**	3,278		**44,591,028**

7.2.4. Expenses incurred with post-employment benefit plans

The effect in the income statement for the periods ended 31 December 2025 and 2024 was as follows:

	2025				2024			
Amounts in Euros	**Current service cost**	**Net interest**	**Defined contribution - Contributions for the period**	**Impact on net profit (Note 7.1)**	**Current service cost**	**Net interest**	**Defined contribution - Contributions for the period**	**Impact on net profit (Note 7.1)**
Pensions with Autonomous Fund	21,343	757,675	-	779,018	20,101	(26,496)	-	(6,395)
Defined-contribution plans	-	-	1,615,375	1,615,375	-	-	1,650,103	1,650,103
	21,343	**757,675**	**1,615,375**	**2,394,393**	**20,101**	**(26,496)**	**1,650,103**	**1,643,708**

7.2.5. Remeasurement recognised directly in other comprehensive income

Amounts in Euros	Remeasurements Demographic assumptions	Financial assumptions	Remeasurements Experience assumptions	Return on plan assets	Gross amount	Deferred tax	Impact on Equity
							2025
Pensions with Autonomous Fund	(6,033,166)	13,321,373	(1,849,855)	3,348,852	8,787,204	(2,245,847)	6,541,357
	(6,033,166)	**13,321,373**	**(1,849,855)**	**3,348,852**	**8,787,204**	**(2,245,847)**	**6,541,357**

Amounts in Euros	Remeasurements Demographic assumptions	Financial assumptions	Remeasurements Experience assumptions	Return on plan assets	Gross amount	Deferred tax	Impact on Equity
							2024
Pensions with Autonomous Fund	-	-	(2,467,179)	3,030,955	563,776	17,693	581,469
	-	**-**	**(2,467,179)**	**3,030,955**	**563,776**	**17,693**	**581,469**

The remeasurements referred to above result from experience gains and losses, both in financial and demographic terms.

Estimates and judgements

Actuarial assumptions

	2025	2024
Social Security Benefits Formula	Decree Law 187/2007 of 10 May	
Disability table	EKV 80	EKV 80
Mortality table	TV 88/90-1	TV 88/90
Discount rate	4.22%	3.50%
Wage growth rate	2.00%	2.00%
Return rate on plan assets	3.50%	3.50%
Pensions growth rate	1,5% ou 2,00%	1,5% ou 2,00%

Sensitivity analysis

Amounts in Euros	2025	2024
0.5% decrease in the discount rate		
Increase in liabilities assumed	9,053,555	10,036,078
0.5% increase in the discount rate		
Decrease in liabilities assumed	(8,262,084)	(9,123,660)
0.5% decrease in the wage growth rate		
Decrease in liabilities assumed	(1,406,766)	(1,636,291)
0.5% increase in the wage growth rate		
Increase in liabilities assumed	1,436,493	1,723,903
0.5% decrease in the pensions growth rate		
Decrease in liabilities assumed	(7,024,413)	(7,547,496)
0.5% increase in the pensions growth rate		
Increase in liabilities assumed	7,538,128	8,111,198

Accounting policies

Post-employment benefits - defined benefit plan

Some of the Group subsidiaries have assumed the commitment to make payments to their employees in the form of complementary retirement pensions, disability, early retirement and survivors' pensions, having constituted defined-benefit plans.

The Group set up autonomous pension funds as a means of funding most of the liabilities. Based on the projected credit unit method, the Group recognises the costs with the attribution of these benefits as the services are provided by the employees. The total liability is estimated separately for each plan at least once every six months, on the date of closing of the interim and annual accounts, by a specialised and independent entity.

The liability thus determined is presented in the consolidated statement of financial position, less the fair value of the funds set up, under Pension liabilities.

Actuarial deviations resulting from changes in the value of estimated liabilities, as a consequence of changes in the financial and demographic assumptions used and experience gains, added to the differential between the actual return on fund assets and the estimated share of net interest, are designated as remeasurements and recorded directly in the consolidated statement of comprehensive income, under retained earnings.

Net interest corresponds to the application of the discount rate to the value of net liabilities (value of liabilities less the fair value of fund assets) and is recognised in the income statement for the period under Payroll costs.

The gains and losses generated by a curtailment or settlement of a defined-benefit plan are recognised in the income statement for the period when the curtailment or settlement occurs. A curtailment occurs when there is a material reduction in the number of employees.

Costs for past liabilities resulting from the implementation of a new plan or increases in benefits granted are recognised in profit or loss for the period in which such changes occur.

Post-employment benefits - defined contribution plan

Most of the Group subsidiaries assumed commitments regarding payments to a defined contribution plan in a percentage of the employees' salary, in order to provide retirement, disability, early retirement and survivors' pensions.

To this end, Pension Funds have been set up to capitalise on those contributions, for which employees may still make voluntary contributions, but for which the Group does not assume any additional contribution responsibilities or a pre-fixed return. Thus, the contributions made are recorded as expenses of the period in which they are recognised, regardless of the time of their settlement.

7.3. Remuneration of corporate bodies

Amounts in Euros	2025	2024
Órgãos Sociais da Navigator		
Board of Directors	2,846,391	2,892,317
Supervisory Board	73,680	75,500
Environment Board	50,200	73,000
Board of the General Shareholders Meeting	6,000	6,000
	2,976,271	**3,046,817**
Corporate Bodies of other Group companies	**304,688**	**304,008**
Total (Note 7.1)	**3,280,959**	**3,350,825**

Remuneration of the members of the Board of Directors

Full details of the remuneration policy for the members of Navigator's Board of Directors are described in the company's Corporate Governance Report.

Three of the current directors are members of pension plans of Navigator Brands, S.A., a subsidiary of the Company, as Employees of that company, before joining management positions.

As at 31 December 2025 and 2024, regarding the members of the Board of Directors of Navigator, there were no: i) any additional liabilities allocated to other long-term benefits, ii) employment termination benefits, iii) share-based payments and iv) any outstanding balances.

8. Financial instruments

8.1. Financial risk management

For the Navigator Group as a whole, the Company has a risk-management programme, which focuses its analysis on the financial markets with a view to mitigate the potential adverse effects on its financial performance. Risk management is undertaken by the Group's Financial Management in accordance with the policies approved by the Board of Directors and monitored by the Risks and Control Commission.

The Company adopts a proactive approach to risk management, as a way to mitigate the potential adverse effects associated with those risks, namely the exchange rate risk and interest rate risk.

8.1.1. Exchange rate risk

Exchange rate risk management policy

A significant part of the Navigator Group’s sales is priced in currencies other than the Euro; therefore, its evolution can have a significant impact on the cash flows obtained from the Group's future sales, with the currency with the greatest impact being the USD. Sales in GBP, PLN and CHF are somewhat significant, whilst sales in other currencies are less significant.

Purchases of some raw materials are also made in USD, namely part of wood and long-fibre pulp imports of wood and acquisitions of long-fibre pulp. Therefore, changes in USD may have an impact on acquisition values.

Moreover, once a sale or purchase is made in a currency other than the Euro, the Group becomes exposed to exchange rate risk until the receipt or payment of such sale or purchase, if no hedging instruments are in place. As a result, there is a significant number of receivables and payables, the latter with lesser expression, exposed to exchange rate risk.

Use of derivative financial instruments

The Group manages foreign exchange risks by using derivative financial instruments, in accordance with a policy that is subject to periodic review and whose purpose is to limit the exchange risk associated with future sales and purchases and accounts receivable and payable and other assets which are denominated in currencies other than the Euro.

In the periods presented, the Group held derivative financial instruments intended to hedge foreign exchange risk arising from future transactions denominated in currencies other than the presentation currency (see Note 8.2 – Derivative financial instruments).

Exposure of financial assets and liabilities to exchange rate risk and sensitivity analysis

2025

Amounts in Euros	US dollar	Sterling pound	Polish zloty	Turkish lira	Swiss franc	Mozambican metical	Moroccan dirham	South African rand	Total (Euro)
Amounts in foreign currency									
Cash and cash equivalents	2,229,995	4,831,415	1,987,114	1,575,354	1,844	116,798,552	261,799	12,641,881	10,170,344
Receivables	142,459,781	41,395,337	11,833,184	124,322	1,362,273	14,793,204	-	15,955,552	173,967,731
Total financial assets	**144,689,776**	**46,226,752**	**13,820,298**	**1,699,676**	**1,364,117**	**131,591,756**	**261,799**	**28,597,432**	**184,138,075**
Interest-bearing liabilities	-	15,105,054	-	-	-	-	-	-	17,310,399
Payables	10,767,238	13,286,521	24,584	92,938	87,448	213,743	118,781	399,229	24,525,990
Total financial liabilities	**10,767,238**	**28,391,575**	**24,584**	**92,938**	**87,448**	**213,743**	**118,781**	**399,229**	**41,836,388**
Net financial position in foreign currency	**155,457,014**	**74,618,327**	**13,844,882**	**1,792,613**	**1,451,565**	**131,805,499**	**380,581**	**28,996,661**	**225,974,463**
Net financial position in Euro	**132,303,841**	**85,512,637**	**3,280,001**	**35,509**	**1,558,476**	**1,757,172**	**35,528**	**1,491,299**	**225,974,463**
Impact of a +10% change in all exchange rates on profit or loss for the period									**19,750,531**
Impact of a -10% change in all exchange rates on profit or loss for the period									**(24,139,538)**
Impact of a +10% change in all exchange rates on equity									**792,602**
Impact of a -10% change in all exchange rates on equity									**(968,736)**

2024

Amounts in Euros	US dollar	Sterling pound	Polish zloty	Turkish lira	Swiss franc	Mozambican metical	Moroccan dirham	South African rand	Total (Euro)
Amounts in foreign currency									
Cash and cash equivalents	1,855,837	1,026,550	114,545	2,182,313	1,828	47,272,452	450,239	8,949,781	3,967,025
Receivables	140,341,158	46,228,701	9,733,718	124,322	1,846,939	7,720,540	-	10,414,727	170,307,957
Total financial assets	**142,196,995**	**47,255,251**	**9,848,263**	**2,306,635**	**1,848,767**	**54,992,992**	**450,239**	**19,364,508**	**174,274,982**
Interest-bearing liabilities	-	17,490,990	-	-	-	-	-	-	19,455,402
Payables	3,046,921	17,102,563	12,888	104,309	78,966	13,405,576	135,216	3,451,095	21,941,882
Total financial liabilities	**3,046,921**	**34,593,553**	**12,888**	**104,309**	**78,966**	**13,405,576**	**135,216**	**3,451,095**	**41,397,284**
Net financial position in foreign currency	**145,243,916**	**81,848,804**	**9,861,151**	**2,410,944**	**1,927,733**	**68,398,568**	**585,455**	**22,815,603**	**215,672,266**
Net financial position in Euro	**139,805,483**	**98,710,538**	**2,306,702**	**65,627**	**2,048,165**	**1,024,084**	**55,657**	**1,162,946**	**245,179,201**
Impact of a +10% change in all exchange rates on profit or loss for the period									**21,633,212**
Impact of a -10% change in all exchange rates on profit or loss for the period									**(26,440,592)**
Impact of a +10% change in all exchange rates on equity									**655,806**
Impact of a -10% change in all exchange rates on equity									**(801,541)**

In this Note, the Group discloses the exposure of financial assets and liabilities to foreign exchange rate risk, as well as the respective sensitivity analysis. There are currencies in which the Group has carried out transactions but in which, at the balance sheet date, it does not have relevant foreign exchange exposures, which is why the exchange rates disclosed in note 1.3.4 are more numerous than the currencies presented in this note.

8.1.2. Interest rate risk

Interest rate risk management policy

A significant share of the Group's financial liabilities cost is indexed to short-term reference interest rates, which are reviewed more than once a year (generally every six months for medium and long-term debt). Hence, changes in interest rates can have an impact on the Group's income statement.

The Group periodically reviews its interest rate risk management strategy. The Group aims to ensure that exposure to variable-rate debt issues remains limited. The actual weight of debt bearing fixed-rate interest (whether directly or through the use of derivative financial instruments) is measured regularly and may be increased or decreased depending on market conditions.

Use of derivative financial instruments

When deemed appropriate by the Board, the Group uses derivative financial instruments (Note 8.2), namely swaps, with the purpose of fixing the interest rate on loans obtained, within certain parameters, deemed appropriate by the Group's risk management policies.

Exposure to interest rate risk

As at 31 December 2025, approximately 30% (31 December 2024: 11%) of the Navigator Group's financial liabilities are indexed to short-term reference interest rates, revised in periods below one year (usually 6-month rates for long-term debt), plus duly negotiated risk spreads.

The following table sets out the assets and liabilities exposed to interest rate risk. This information therefore excludes assets and liabilities whose interest rate risk is fully hedged by derivative financial instruments with a maturity and/or reset date identical to that of the underlying asset.

As at 31 December 2025 and 2024, the detail of the financial assets and liabilities with interest rate exposure, considering the maturity or the next interest-fixing date is as follows:

Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	2025 Total
As at 31 December 2025						
Assets						
Current						
Cash and cash equivalents	130,229,469	-	-	-	-	130,229,469
Total financial assets	**130,229,469**	**-**	**-**	**-**	**-**	**130,229,469**
Liabilities						
Non-current						
Interest-bearing liabilities	-	-	-	86,315,789	158,684,211	245,000,000
Finance leases	-	-	-	920,399	-	920,399
Current						
Interest-bearing liabilities	-	-	15,350,870	-	-	15,350,870
Finance leases	-	-	1,039,130	-	-	1,039,130
Total financial liabilities	**-**	**-**	**16,390,000**	**87,236,188**	**158,684,211**	**262,310,399**
Cumulative difference	**130,229,469**	**130,229,469**	**113,839,469**	**26,603,281**	**(132,080,930)**	

Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	2024 Total
As at 31 December 2024						
Assets						
Current						
Cash and cash equivalents	286,628,866	-	-	-	-	286,628,866
Total financial assets	**286,628,866**	**-**	**-**	**-**	**-**	**286,628,866**
Liabilities						
Non-current						
Interest-bearing liabilities	-	-	-	10,000,000	80,000,000	90,000,000
Finance leases	-	-	-	2,715,195	-	2,715,195
Current						
Interest-bearing liabilities	-	-	23,891,108	-	-	23,891,108
Finance leases	-	-	1,717,499	-	-	1,717,499
Total financial liabilities	**-**	**-**	**25,608,607**	**12,715,195**	**80,000,000**	**118,323,802**
Cumulative difference	**286,628,866**	**286,628,866**	**261,020,259**	**248,305,064**	**168,305,064**	

Estimates and judgements

Sensitivity analysis

The Group uses the sensibility analysis technique to measure impacts on the income statement and equity of increase or decrease on interest rates maintaining the other variables constant. This is an illustrative analysis only, since changes in market rates rarely occur separately.

The sensitivity analysis is based on the following assumptions:

i. Changes in market interest rates affect interest income and expenses arising from variable financial instruments;

ii. Changes in market interest rates affect the fair value of derivative financial instruments as well as other financial assets or liabilities;

iii. Changes in fair value of derivative financial instruments and other financial assets and liabilities are measured using the discounted cash flows method, with market interest rates at year end.

A 0.50% increase in interest rates on which interest on Group loans are calculated would have an impact on its profit before income tax, for the period ended 31 December 2025 by approximately Euro 1,311,552 (31 December 2024: Euro 591,619).

8.1.3. Liquidity risk

Liquidity risk management policy

The Group manages the liquidity risk in two ways:

i. ensuring that its financial debt has a high medium- and long-term component with maturities appropriate to the characteristics of the industries where it operates, and

ii. by contracting with financial institutions credit facilities available at all times for an amount that guarantees adequate liquidity.

Available and undrawn credits

The Group's policy is to maintain credit facilities at adequate levels to, together with the amount of Cash and Cash Equivalents in order to guarantee, with some comfort margin, the cash cycle expected for the next 12 months.

Contractual maturity of financial liabilities (undiscounted flows, including interest)

						2025
Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Total
As at 31 December 2025						
Liabilities						
Interest-bearing liabilities (Note 5.7)						
Bond loans	-	1,663,986	13,119,360	107,898,425	490,618,581	613,300,352
Commercial paper	-	35,254,022	7,245,536	54,808,685	-	97,308,243
Bank loans	-	5,589,584	22,861,519	88,737,329	119,496,660	236,685,092
Other loans	-	-	7,219,439	7,219,439	-	14,438,878
Total liabilities	**-**	**42,507,592**	**50,445,854**	**258,663,878**	**610,115,241**	**961,732,565**
Of which interest (at the rates prevailing at that date)						**126,431,701**

Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	2024 Total
As at 31 December 2024						
Liabilities						
Interest-bearing liabilities (Note 5.7)						
Bond loans	420,000	10,521,500	99,941,464	392,316,564	210,017,643	713,217,171
Commercial paper	-	35,497,000	248,500	35,248,500	50,000,000	120,994,000
Bank loans	-	4,969,536	10,158,078	70,362,247	37,668,335	123,158,196
Other loans	-	-	7,219,439	15,905,149	-	23,124,588
Derivative financial instruments (Note 8.2)	-	1,259,512	2,879,804	2,659,143	(783,753)	6,014,706
Total liabilities	**420,000**	**52,247,548**	**120,447,285**	**516,491,603**	**296,902,225**	**986,508,661**
Of which interest (at the rates prevailing at that date)						**77,506,038**

The contractual maturity of interest-bearing liabilities is subject to compliance with financial covenants, as detailed in Note 5.7 – Interest-bearing liabilities.

Available and undrawn credit facilities

Amounts in Euros	2025	2024
Undrawn credit facilities		
Commercial paper (with long term underwriting)	172,519,997	75,000,000
Long-term financing contracted and not disbursed	90,000,000	140,000,000
Other credit facilities	45,209,861	95,163,917
	307,729,858	**310,163,917**
Commercial paper used (Note 5.7)	90,730,003	120,000,000
Other credit facilities used	746,766,421	787,420,613
Contracted credit facilities (nominal value)	**1,145,226,282**	**1,217,584,530**

8.1.4. Credit risk

Credit risk management policy

The Group is exposed to credit risk on balances receivable from Trade and other receivables and has adopted a policy of managing risk coverage within certain levels through credit insurance with a specialised independent company.

The Group has adopted a policy of credit insurance for the majority of Trade receivables, with a 5% deductible. As such, its exposure to credit risk is considered to have been mitigated up to acceptable levels, when compared with its sales. Most sales that are not covered by credit insurance are covered by bank guarantees, letters of credit, documentary credits or retention of title agreements, and any unhedged exposure is within limits previously approved by the Executive Committee.

However, the worsening of global economic conditions or adversities affecting only economies on a local scale may lead to deterioration in the ability of the Navigator Group's Customers to meet their obligations, leading entities providing credit insurance to significantly decrease the amount of credit facilities that are available to those Customers. This scenario may result in limitations on the amounts that can be sold to some Group Customers without directly incurring credit risk levels that are not compatible with the risk policy in this area.

Cash equivalents

The Navigator Group adopts strict policies in approving its financial counterparties, limiting its exposure in accordance with an individual risk analysis and within previously approved limits.

Maximum exposure to credit risk

The Group's maximum exposure to the credit risk of financial assets corresponds to their net amount, as follows:

Amounts in Euros	2025	2024
Non-current		
Receivables (Note 4.2)	1,975,387	13,142,937
Current		
Receivables (Note 4.2)	420,298,809	496,698,621
Cash and cash equivalents (Note 5.9)	130,229,469	286,628,866
	552,503,665	**796,470,424**

Ageing structure of trade receivables balances

As at 31 December 2025 and 2024, Trade receivables balances presented the following ageing structure, considering as reference the maturity date of the outstanding amounts before impairment:

Amounts in Euros	2025	2024
Outstanding amounts	266,704,625	273,547,400
1 to 90 days	24,760,207	30,245,008
91 to 180 days	535,101	1,022,450
181 to 360 days	409,772	215,099
361 to 540 days	93,400	6,341
541 to 720 days	138,874	6,199
more than 721 days	-	-
	292,641,979	**305,042,497**
Balances considered impaired	3,600,788	3,635,137
Impairment	(3,600,788)	(3,635,137)
Net balance of trade receivables (Note 4.2)	**292,641,979**	**305,042,497**
Trade receivables covered by credit insurance	249,800,318	264,061,504
Trade receivables covered by bank guarantees	2,000,000	2,000,000
Trade receivables covered by title retention agreements	2,389,173	1,873,390
Trade receivables covered by letters of credit / documentary remittances	24,275,823	33,593,182
Covered receivables	**278,465,314**	**301,528,076**
Available and undrawn credit facilities	647,543,830	463,762,720
Credit hedging facilities contracted	**926,009,144**	**765,290,796**

The amounts shown above correspond to the amounts outstanding according to the contracted due dates. The amounts not covered, which are overdue, totalling Euro 4,716,149 relate to amounts previously approved by the Navigator Executive Committee (2024: Euro 3,514,421).

Despite some delays in the settlement of those amounts, that does not result, in accordance with the available information, in the identification of impairment losses other than the ones considered through the respective losses. These are calculated based on the information periodically collected on the financial behaviour of the Group's Customers, which allow, in conjunction with the experience obtained in the client portfolio analysis and with the history of credit defaults, in the part not attributable to the insurance company, to define the amount of losses to be recognised in the period. The guarantees in place for a significant part of outstanding and long-term balances, justify the fact that no impairment loss has been recorded for those balances. The rules defined by the credit risk insurance policy applied by the Group, ensure a significant hedge of all outstanding balances.

The analysis of the open balances, by business area, is as follows:

						2025
Amounts in Euros	**Pulp Market**	**UWF Paper**	**Tissue Paper**	**Energy**	**Support**	**Total**
Outstanding amounts	24,483,712	163,910,174	74,975,201	769,659	2,565,879	266,704,625
1 to 90 days	3,541,244	14,119,113	3,662,326	369,212	3,068,312	24,760,207
91 to 180 days	5,881	178,244	271,766	-	79,210	535,101
181 to 360 days	275,496	-	134,276	-	-	409,772
361 to 540 days	-	-	93,400	-	-	93,400
541 to 720 days	-	-	138,874	-	-	138,874
more than 721 days	-	-	-	-	-	-
	28,306,333	**178,207,531**	**79,275,843**	**1,138,871**	**5,713,401**	**292,641,979**

Amounts in Euros	Pulp Market	UWF Paper	Tissue Paper	Energy	Support	2024 Total
Outstanding amounts	28,197,445	140,978,332	98,205,591	600,064	5,565,968	273,547,400
1 to 90 days	10,833,565	14,703,039	2,951,668	144,586	1,612,150	30,245,008
91 to 180 days	59,624		654,571	-	308,255	1,022,450
181 to 360 days	-	-	194,692	-	20,407	215,099
361 to 540 days	-	-	6,341	-		6,341
541 to 720 days	-	-	6,199	-		6,199
more than 721 days	-	-	-	-		-
	39,090,634	**155,681,371**	**102,019,062**	**744,650**	**7,506,780**	**305,042,497**

The table below presents the Group's credit risk quality as at 31 December 2025 and 2024, with respect to financial assets (Cash and cash equivalents), (based on the highest credit rating assigned by Standard & Poor's or, alternatively, by Fitch, where no rating has been assigned by the former):

Financial Institutions

Amounts in Euros	2025	2024
Rating		
AA	-	-
AA-	-	-
A+	29,021,315	179,063,225
A	34,104,169	98,950,633
A-	60,416,986	2,305,027
BBB+	3,320,689	1,315,948
BBB	370,041	4,028,844
BBB-	305	69,018
BB+	-	-
BB	-	-
BB-	-	-
B+	-	-
B	-	-
B-	-	-
Other	2,995,964	896,171
	130,229,469	**286,628,866**

The amounts included under Other comprise bank deposits with banks or entities with no rating, mainly banks located in Mozambique.

The Navigator Group adopts strict policies in approving its financial counterparties, limiting its exposure in accordance with an individual risk analysis and within previously approved limits.

Impairment on Trade and other receivables

Amounts in Euros	Impairment		
	Trade receivables	**Other receivables**	**Total**
Balance as at 1 January 2024	**(3,293,670)**	**(345,488)**	**(3,639,158)**
Change in the perimeter	(40,111)	-	(40,111)
Increase – IFRS 9 impact on profit or loss for the period	(1,477,280)	-	(1,477,280)
Increases (Note 2.3)	(242,088)	(98,476)	(340,564)
Reversals	3,924,074	181,747	4,105,821
Charge-off	86,270	-	86,270
Transfers	(2,591,399)	-	(2,591,399)
Exchange rate adjustment	(933)	-	(933)
Balance as at 31 December 2024	**(3,635,137)**	**(262,217)**	**(3,897,354)**
Increase – IFRS 9 impact on profit or loss for the period	(190,008)	-	(190,008)
Increases (Note 2.3)	(103,954)	(1,283)	(105,237)
Reversals	268,219	224,466	492,685
Charge-off	11,503	-	11,503
Transfers	-	(92,268)	(92,268)
Exchange rate adjustment	48,589	7,540	56,129
Balance as at 31 December 2025	**(3,600,788)**	**(123,762)**	**(3,724,550)**

Accounting policies

Impairment of debt instruments

The Group assesses, on a prospective basis, the expected credit losses associated with its financial assets measured at amortised cost and at fair value through other comprehensive income, in accordance with IFRS 9.

On this basis, the Group recognises expected credit losses throughout the lifetime of financial instruments that have been subject to significant increases in credit risk since its initial recognition, assessed either individually or collectively, considering all reasonable and sustainable information, including available prospective information.

If, at the reporting date, the credit risk associated with a financial instrument has not increased significantly since its initial recognition, the Group measures the impairment of that financial instrument by an amount equivalent to the expected credit losses.

IFRS 9 provides that for the calculation of these impairment, one of two models is used: the 3-step method or the use of a matrix, the distinguishing component being the existence or not of a significant financing component. For Navigator's financial assets, since it is not a financial institution and there are no assets that have a significant financing component, the use of a matrix was chosen.

The model adopted for the impairment assessment in accordance with IFRS 9 is as follows:

i. Calculate the total credit sales made by the Group over the last 12 months, as well as the total amount of bad debts relating to them;

ii. Determine the Customers' payment profile, by setting buckets of receipt frequency;

iii. Based on I. and II. above, estimate the probability of default (*i.e.*, the amount of bad debts calculated at I. compared to the balance of outstanding sales in each bucket calculated at II.);

iv. Adjust the percentages of future forecasts obtained in III.;

v. Apply the default percentages as calculated in IV. to the balances of Customers still outstanding at the reporting date.

Although IFRS 9 assumes 90 days as "default", the Navigator Group considered a period of 180 days, since the experience of real losses before this period is low. This period is aligned with the current risk management policies of the company, namely in what regards the credit insurance hired, and to the fact that there are no sales with significant components of funding in light of IFRS 15. Additionally, the company evaluated the impact of considering 180 days of "default" instead of the 90 days and the Expected Credit Loss would not change significantly.

In addition to this period, in the event of an accident in the credit insurance company, the model considers the limit of 5% paid by the Navigator Group (10% for national Customers).

In addition, the Group recognises impairment on a case-by-case basis, based on specific balances and specific past events, considering the historical information of the counterparties, their risk profile and other observable data in order to assess whether there are objective indicators of impairment for these financial assets. The Group uses the write-off procedure only when the credit is considered to be definitely uncollectible by a court decision.

8.2. Derivative financial instruments

Movements in derivative financial instruments

	2025			2024		
Amounts in Euros	**Trading derivatives**	**Hedging derivatives**	**Net total**	**Trading derivatives**	**Hedging derivatives**	**Net total**
Balance at the beginning of the period	**(1,631,313)**	**16,342,114**	**14,710,801**	**(4,068,868)**	**17,835,988**	**13,767,120**
Net contracts / settlements	1	(3,426,873)	(3,426,872)	4,967,834	(11,296,062)	(6,328,228)
Change in fair value through profit or loss (Note 5.10)	1,977,198	3,426,873	5,404,071	(2,530,279)	11,328,732	8,798,453
Change in fair value through other comprehensive (Note 5.5)	-	(15,935,709)	(15,935,709)	-	(1,526,544)	(1,526,544)
Balance at the end of the period	**345,886**	**406,405**	**752,291**	**(1,631,313)**	**16,342,114**	**14,710,801**

8.2.1. Detail and maturity of derivative financial instruments by nature

2025

Amounts in Euros	Notional	Currency	Maturity	Positive (Note 4.2)	Negative (Note 4.3)	Net amount
Hedging						
Future sales	163,200,000	USD	2026	95,723	(563,525)	(467,802)
Future sales	190,140,000	GBP	2026	165,859	(241,641)	(75,782)
Long-term foreign exchange hedging	16,060,421	USD	2028	-	(15,449)	(15,449)
Hedging in subsidiaries	4,668,772	USD	2026	58,203	-	58,203
Interest rate swaps - Bonds	425,000,000	EUR	2032	7,485,306	(1,517,038)	5,968,268
Energy	24,653,150	EUR	2027	549,492	(5,610,525)	(5,061,033)
				8,354,583	**(7,948,178)**	**406,405**
Trading						
Foreign exchange forwards	62,800,000	USD	2026	387,827	-	387,827
Foreign exchange forwards	18,200,000	GBP	2026	-	(41,941)	(41,941)
				387,827	**(41,941)**	**345,886**
				8,742,410	**(7,990,119)**	**752,291**

2024

Amounts in Euros	Notional	Currency	Maturity	Positive (Note 4.2)	Negative (Note 4.3)	Net amount
Hedging						
Future sales	272,000,000	USD	2025	-	(1,103,142)	(1,103,142)
Future sales	130,000,000	GBP	2025	-	(262,405)	(262,405)
Interest rate swaps - Bonds	535,000,000	EUR	2031	8,383,516	(3,314,640)	5,068,876
Energy	24,653,150	EUR	2025	12,638,785	-	12,638,785
				21,022,301	**(4,680,187)**	**16,342,114**
Trading						
Foreign exchange forwards	60,500,000	USD	2025	-	(1,597,134)	(1,597,134)
Foreign exchange forwards	40,900,000	GBP	2025	-	(34,179)	(34,179)
				-	**(1,631,313)**	**(1,631,313)**
				21,022,301	**(6,311,500)**	**14,710,801**

Cash flow hedge | Exchange rate risk EUR/USD and EUR/GBP

During the first half of 2025, the Group concluded the Zero Cost Collar contracting of the derivative financial instruments initiated in the last quarter of 2024, thus guaranteeing full hedging of the estimated exposure of its foreign currency sales in 2025, amounting to USD 272,000,000 and GBP 210,000,000. During the third quarter, the Group initiated the contracting of hedges corresponding to the forecast exposure of foreign currency sales for 2026, having secured, during the period, hedges covering USD 149,600,000 and GBP 190,140,000 of the total exposure to be hedged.

Interest rate hedge

During the first quarter of 2025, a swap with a notional value of Euro 10,000,000 associated with financing contracted for the period 2019-2025 matured and was settled during that period. In the third quarter of 2025, the Group contracted two swaps of Euro 62,500,000 each to fix the interest rate associated with the Navigator 2025-2032 SLB bond loan, in the amount of Euro 125,000,000, both starting in August 2025. During the third quarter of 2025, the Group settled four interest rate swaps with a total notional amount of Euro 175,000,000 due to the early redemption of two bond issues maturing in 2026, generating a cash inflow of Euro 3,984,173.

Energy Hedging

Given the Group's exposure to price risk in the procurement of electricity and natural gas, during 2025 the price hedging strategy initiated in the course of 2024 was strengthened through the contracting of swaps to fix prices, covering approximate volumes of 558,101 MWh for electricity and 1,121,163 MWh for natural gas. Additionally, swaps were contracted to fix electricity prices for 2026, covering a volume of 319,211 MWh, and of natural gas, covering a volume of 1,206,488 MWh.

For 2027, swaps were also contracted to fix electricity prices, corresponding to 194,160 MWh.

Estimates and judgements

Fair value of derivative financial instruments

Whenever possible, the fair value of derivatives is estimated on the basis of quoted instruments. In the absence of market prices, the fair value of derivatives is estimated through the discounted cash-flow method and option valuation models, in accordance with prevailing market assumptions.

Accounting policies

The fair value of derivative financial instruments is included under Payables (Note 4.3), when negative, and under Receivables (Note 4.2), when positive.

In accordance with IFRS 9 – Financial Instruments, the Group has opted to continue applying the hedge accounting requirements of IAS 39 – Financial Instruments, until there is greater visibility on the Dynamic Risk Management (macro hedging) project currently in progress.

Whenever expectations of changes in interest or exchange rates so justify, the Group hedges these risks through derivative financial instruments, such as interest rate swaps (IRS), interest rate and foreign exchange collars, forwards, etc.

Trading derivative financial instruments

Although the derivatives contracted by the Group represent effective economic hedges of risks, not all of them qualify as hedging instruments in accounting terms to satisfy the applicable rules and requirements. Instruments that do not qualify as hedging instruments are recorded in the Consolidated statement of financial position at their fair value and changes are recognised in Net financial results (Note 5.10), when related to financing operations, or in External services and supplies (Note 2.3) or Revenue (Note 2.1), when referring to hedging of sales receivable flows in a currency other than the presentation currency.

Derivative financial instruments - hedging

Derivative financial instruments used for hedging purposes may be recognised as hedging instruments provided that they comply, cumulatively, with the conditions set out in IAS 39.

Cash flow hedging (interest rate, exchange rate, energy and commodity risk – BHKP)

As part of its management of exposure to interest rates, exchange rates and energy prices, the Group applies cash flow hedging.

Those transactions are recorded in the Interim consolidated statement of financial position at their fair value, if considered effective hedges. The effective portion of changes in the fair value of derivatives that are designated

and qualify as cash flow hedges is recognised in other comprehensive income. The gain or loss relating to the ineffective portion is recognised immediately in the income statement.

Accumulated amounts in equity are reclassified to profit or loss in the periods when the hedged item affects the Income statement (for example, when the forecast sale that is hedged takes place). The gain or loss relating to the effective portion of interest rate swaps hedging variable rate borrowings is recognised in the income statement under Net financial results (Note 5.10). However, when the forecast transaction that is hedged results in the recognition of a non-financial asset (for example, inventory or property, plant and equipment), the gains and losses previously deferred in equity are transferred from equity and included in the initial measurement of the cost of the asset.

When a hedging instrument expires or is sold, or when a hedge no longer meets the criteria for hedge accounting, any cumulative gain or loss existing in equity is recycled to the income statement, unless the hedged item is a forecast transaction, in which case any cumulative gain or loss existing in equity at that time remains in equity and is recognised when the forecast transaction is ultimately recognised in the income statement.

Derivative financial instruments used by Navigator Group

Foreign exchange trading derivatives

The Navigator Group has a currency exposure on sales invoiced in foreign currencies, namely US dollars (USD) and pounds sterling (GBP). As the Group presents its consolidated financial statements in Euro, it is exposed to economic risk arising from the translation of these currency cash flows into the Euro. The Group is also required, albeit to a lesser degree, to make certain payments in those same currencies which, for currency exposure purposes, act as a natural hedge. Thus, the hedge is aimed at safeguarding the net value of items in the statement of financial position denominated in a currency other than the presentation currency against the respective currency fluctuations.

The hedging instruments used in this operation are foreign exchange forward contracts covering the net exposure to currencies other than the presentation currency, for amounts and due dates close to that exposure. The nature of the risk hedged is the change in the book value on sales and purchases expressed in currencies other than the presentation currency. At the end of each month, the balances of Trade receivables and Trade payables expressed in foreign currency are updated, with the gain or loss offset against the fair value change of the forwards negotiated.

Cash flow hedge | Exchange rate risk EUR/USD and EUR/GBP

The Group makes use of derivative financial instruments in order to limit the net exchange risk associated with sales and future purchases estimated at USD and GBP.

Hedging of future purchases | Energy hedging

The Group uses derivative financial instruments to limit the price risk associated with its estimated exposure to future purchases of electricity and natural gas.

Cash flow hedge | Interest rate

The Navigator Group hedges future interest payments associated with commercial paper issues by hiring an interest rate swap, which pays a fixed rate and receives a floating rate. This instrument is designated as hedge of cash flows from the commercial paper programme and the bond loan.

Cash flow hedge | Commodities - BHKP

The Navigator Group uses derivative financial instruments in order to minimise the exposure risk associated with the variation of the pulp price, indexed to PIX, in USD.

8.3. Financial assets and liabilities

8.3.1. Categories of Group Financial Instruments

The financial instruments included in each caption of the consolidated statement of financial position are classified as follows:

Amounts in Euros	Note	Financial assets at amortised cost	Hedging derivative financial instruments	Trading derivative financial instruments	Financial assets outside the scope of IFRS 9	Non-financial assets	Total
As at 31 December 2025							
Non-current receivables	4.2	1,975,387	-	-	-	-	1,975,387
Current receivables	4.2	325,178,129	8,354,583	387,827	-	86,378,270	420,298,809
Cash and cash equivalents	5.9	130,229,469	-	-	-	-	130,229,469
Total Assets		**457,382,986**	**8,354,583**	**387,827**	**-**	**86,378,270**	**552,503,666**
As at 31 December 2024							
Non-current receivables	4.2	13,142,937	-	-	-	-	13,142,937
Current receivables	4.2	361,625,103	21,022,301	-	-	114,051,217	496,698,621
Cash and cash equivalents	5.9	286,628,866	-	-	-	-	286,628,866
Total Assets		**661,396,907**	**21,022,301**	**-**	**-**	**114,051,217**	**796,470,425**

Amounts in Euros	Note	Financial liabilities at amortised cost	Hedging derivative financial instruments	Trading derivative financial instruments	Financial liabilities outside the scope of IFRS 9	Non-financial liabilities	Total
As at 31 December 2025							
Interest-bearing liabilities	5.7	833,858,339	-	-	-	-	833,858,339
Lease liabilities	5.8	-	-	-	132,529,668	-	132,529,668
Payables	4.3	637,651,863	7,948,178	41,941	-	-	645,641,982
Total Liabilities		**1,471,510,202**	**7,948,178**	**41,941**	**132,529,668**	**-**	**1,612,029,989**
As at 31 December 2024							
Interest-bearing liabilities	5.7	903,977,752	-	-	-	-	903,977,752
Lease liabilities	5.8	-	-	-	111,736,900	-	111,736,900
Payables	4.3	769,419,687	4,680,187	1,631,313	-	-	775,731,187
Total Liabilities		**1,673,397,439**	**4,680,187**	**1,631,313**	**111,736,900**	**-**	**1,791,445,839**

8.3.2. Fair value of financial assets and liabilities

Financial assets and liabilities measured at fair value

Amounts in Euros	2025 Level 1	2025 Level 2	2025 Level 3	2024 Level 1	2024 Level 2	2024 Level 3
Financial assets at fair value through profit and loss						
Hedging derivatives (Note 8.2)	-	387,827	-	-	-	-
Hedging financial instruments (Note 8.2)	-	8,354,583	-	-	21,022,301	-
Assets measured at fair value						
Biological assets (Note 3.8)	-	-	120,646,643	-	-	115,250,198
Total Assets	**-**	**8,742,410**	**120,646,643**	**-**	**21,022,301**	**115,250,198**
Financial liabilities at fair value through profit or loss						
Trading derivatives (Note 8.2)	-	(41,941)	-	-	(1,631,313)	-
Hedging financial instruments (Note 8.2)	-	(7,948,178)	-	-	(4,680,187)	-
Total Liabilities	**-**	**(7,990,119)**	**-**	**-**	**(6,311,501)**	**-**

Estimates and judgements

Fair value of fixed-interest interest-bearing liabilities

The fair value of these liabilities is calculated using the discounted cash flow method at the reporting date, using a discount rate in accordance with the characteristics of each financing, belonging to level 2 of the fair value hierarchy of IFRS 13.

Accounting policies

The fair value of financial instruments is classified according to the fair value hierarchy of IFRS 13 - Fair Value Measurement:

Level 1 Based on quotes from active net markets at the reporting date.

Level 2 Determined using evaluation models, the main inputs of which are observable in the market.

Level 3 Determined using evaluation models, the main inputs of which are not observable in the market.

9. Operational risk management

The Group operates in the forestry sectors, in the production of eucalyptus for use in the production of BEKP pulp, which it incorporates essentially in the production of UWF and tissue paper but is also sold in the market, and in energy production, essentially through the forest biomass that is generated in the BEKP production process.

All the activities in which the Group is involved are subject to risks which could have a significant impact on its operations, its operating profit or loss, the cash flow generated and in its financial position.

The risk factors analysed in this chapter can be structured as follows:

i. Specific risks inherent to the sectors of activity in which the Navigator Group operates:

- Risks associated with the forestry sector (Note 9.1.1)
- Risks associated with the production and sale of BEKP pulp, UWF paper and tissue paper (Note 9.1.2)
- Risks associated with the production of energy (Note 9.1.3)
- Environmental risks (Note 9.1.4)
- Human resources and talent management (Note 9.1.5)
- Information systems and cybersecurity (Note 9.1.6)
- Other risks associated the Group's activity (Note 9.1.7)
- General context risks (Note 9.1.8)

ii. Group risks and the way it performs its activities.

The Group has a risk-management programme in place which is focused on the analysis of the financial markets in order to mitigate the potential adverse effects on its financial performance. Risk management is conducted by the Finance Department in accordance with policies approved by the Board of Directors. The Finance Department evaluates and undertakes the hedging of financial risks in strict coordination with the Group's operating units.

The Board of Directors provides the principles of risk management as a whole and policies covering specific areas such as foreign exchange risk, interest rate risk, liquidity risk, credit risk, the use of derivatives and other non-derivative financial instruments and the investment of liquidity surplus. The Risk Management Department monitors the implementation of risk management policies defined by the Board of Directors.

9.1. Specific risks inherent to the sectors of activity in which the Navigator Group operates

9.1.1. Risks associated with the forestry sector

As at 31 December 2025, the Navigator Group had under management approximately 112.4 thousand hectares of forest assets, a figure in line with that of the previous year. This area is distributed between Portugal and Spain, organised into 1,442 Management Units across 173 Portuguese municipalities, and 66 Management Units located in two provinces of Galicia and one province of Asturias, in accordance with the principles set out in the Group's Forestry Policy.

The forest stand consists mainly of eucalyptus, including areas currently under afforestation with species of the same genus, which account for 73% of the total area under management. *Eucalyptus globulus* remains the benchmark species, widely recognised for the quality of the fibre used in the production of high-performance papers. In addition, conservation areas account for approximately 11.9% of the total land area in Portugal, as well as areas covered by pine and cork oak, species in which the Group positions itself as one of the leading private producers at national level.

Navigator has long played a pioneering role in promoting forest management certification in Portugal. Currently, almost all of the areas managed in mainland Portugal are certified under the FSC® system – FSC®-C010852 and the PEFC system – PEFC/13-23-001, ensuring responsible forest management in compliance with stringent environmental, economic and social criteria recognised internationally.

The Group's presence in particularly demanding international markets, where demand for certified products is growing and structural in nature, underscore the importance of forest certification. Against this backdrop, Navigator launched a programme in 2016 aimed at promoting the adoption of sustainable forest management practices by private producers. This initiative contributed to improving management practices, increasing the value of production and strengthening the capacity to meet global demand for certified products. Between 2016 and 2025, certified forest area in Portugal increased from 370,000 hectares to approximately 679,000 hectares under the FSC® system, and from 260,000 hectares to approximately 331,000 hectares under the PEFC system.

Despite this progress, structural challenges remain, as a significant portion of Portuguese forestland continues to be uncertified. By the end of 2025, Navigator managed approximately 3% of the national forest area; however, this represented 33% of the area certified under PEFC and 16% of that certified under FSC® (compared with 33% and 17%, respectively, in 2024).

The positive trend recorded nevertheless provides grounds for looking to the future with confidence: in 2025, 79% of domestically sourced wood purchases—excluding wood originating from the Group's own forest areas—came from properties under certified forest management, exceeding the 73% recorded in 2024. Over the same period, there was a significant increase in the number of certified suppliers at the chain-of-custody level, contributing to the strengthening of supply sustainability.

Since 2007, Navigator has implemented a mechanism for the differentiated valuation of wood delivered to its industrial facilities, granting a price premium when the wood originates from areas under certified forest management. This measure, innovative at a global level, contributed to consolidating forest certification as a remunerated and recognised practice across the value chain.

The competitiveness of the eucalyptus value chain faces, however, relevant constraints, namely the low productivity of Portuguese forestland, associated with insufficient levels of active forest management. This scenario creates additional pressures, including greater exposure to wildfire risk, phytosanitary vulnerabilities and lower levels of profitability for

producers. Furthermore, the lack in recent years of strategic public policies aimed at promoting forest modernisation has led to a growing need to import raw materials.

In light of these challenges, Navigator considers active forest management and increased productivity to be essential strategic priorities. The Group develops several initiatives, including the supply of genetically improved plants, technical support through the Premium and e-globulus programmes, as well as the delivery of training initiatives aimed at strengthening the technical qualifications of producers and operators in the sector.

Among the most noteworthy initiatives is the Navigator Forest Producers Club, launched in November 2023. This pioneering project, targeted at all professionals whose activity depends on the forest, aims to support the implementation of responsible and active forest management models. By the end of 2025, the Club already had more than six hundred members, highlighting the need for capacity-building mechanisms and for strengthening competitiveness across the value chain.

Navigator's collaboration with Biond, the association representing forest-based bio-industries, further strengthens the Group's engagement within the sector. As part of the Better Eucalyptus Programme, the "Clean & Fertilise" initiative funds the fertilisation of landowners' plots and, up to 2025, this Programme covered 88,546 hectares, of which 17,358 hectares received two fertilisation cycles, supporting 11,488 forest producers, mostly operating in small-scale holdings.

In addition, the Burnt Areas Recovery Programme is currently underway, with a total of 1,510 hectares to be restored by the end of 2025. In parallel, the Better Forest Project continues, having benefited 1,476 hectares up to 2025.

The sector also faces a complex and restrictive regulatory framework, which has contributed to the continued reduction of forested and reforested areas in Portugal, thereby undermining the economic sustainability of a wide network of small service providers, which are essential to the active management of rural territory.

In the area of rural wildfires, Navigator's activities are exposed to two main impacts:

- loss of timber, both owned and third-party, current and future;
- increased operating costs, related to post-fire harvesting and soil preparation.

The mitigation of these risks begins with the strict management of the areas under the Group's responsibility, complemented by a strong investment in Innovation and Development, aimed at adapting forestry practices to the specific characteristics of Portuguese forestland.

The most relevant measures include:

- the conservation of biodiversity,
- the planning of forest infrastructure,
- and the systematic maintenance of roads and access routes, which are essential for wildfire prevention and response.

Navigator is also a member, together with the ALTRI Group, in AFOCELCA, a forest protection entity established through a Complementary Grouping of Companies. This structure ensures a national wildfire prevention and suppression system, covering approximately 200 thousand hectares of owned and surrounding forestland, in coordination with the Integrated Rural Fire Management System. AFOCELCA has an annual budget of over Euro 4.5 million, fully funded by the companies within the grouping, without recourse to public or European funds.

With regard to Mozambique, the Group has been granted Land Use and Use Rights (DUAT), located in the provinces of Manica and Zambézia, comprising about 50 plots (most of which are non-contiguous), and a planting permit for up to 240,000 hectares, made available under the Investment Agreement signed with the Mozambican Government, of which around 14,000

thousand hectares had been planted. The project involved the installation of an industrial unit for the production of BEKP pulp and electric power in that country.

The Mozambican Government and Portucel Moçambique signed a Memorandum of Understanding (MoU) through which they agreed on a set of preceding conditions required to proceed with the investment, namely and particularly of a logistical nature, which will be implemented in two phases. Once the above conditions have been met, in an initial phase, the forest base will be increased to approximately 40,000 hectares, which will guarantee the supply of raw material to a eucalyptus wood chip production facility (yet-to-be-built) for export, with a capacity of around 1 million tonnes per year, in an estimated additional investment of USD 160 million.

Due to the repeated delays in fulfilling the conditions precedent to the start of construction of this infrastructure, Portucel continues to evaluate the feasibility of alternative logistics solutions, either through the port of Nacala (Nampula) or through a temporary solution in Macuse (Zambézia).

Navigator and the Government of Mozambique have been working under the terms of the MoU signed, particularly in relation to land matters and forest development. In 2019, the first Forest Development programme in Mozambique was launched, a Government initiative funded by the World Bank. The goal is to promote small and medium-scale sustainable commercial forest plantations and the restoration of degraded areas, with about 4,000 ha of eucalyptus plantations already in full production. Since the beginning of the programme, Portucel Moçambique has played an active role in developing and implementing the programme, providing a range of support, such as defining the forestry model, supplying cloned plants at subsidised prices, providing access to inputs (fertilisers) at market prices, and sharing know-how.

In 2025, the timber harvesting operations from Portucel Moçambique's plantations in Manica and Zambézia continued, supplying the veneer/plywood industry that has set up operations near the company’s plantations in both provinces. This will continue to enable, amongst other objectives, the ongoing efforts to put Mozambique on the global map of this forest-based industry. Throughout 2025, approximately 190,000 m³ of timber were supplied to the market (100% for processing in the domestic market). For market-related reasons, no timber exports were carried out in 2025.

The Group also has a research institute, RAIZ, established in 1996 in partnership with three universities, a pioneering initiative in Portugal that reflects Navigator's commitment to innovation and sustainability.

Its activities are focused on research, innovation and specialised services in the eucalyptus forestry-industrial sector, promoting more productive and resilient forests, more efficient industrial processes and developing innovative and sustainable forest-based bioproducts.

It has 95 employees, 30% of whom are PhDs, and is one of the 10 organisations with the most international patents in Portugal.

Their activity is aligned with the Company's purpose: “It is people, their quality of life and the future of the planet that inspire and move us.” This positioning reflects our ongoing commitment to creating responsible value through sustainable, recyclable and biodegradable solutions, sourced from planted eucalyptus forests.

With solid investment in R&D and innovation geared towards sustainability and the circular economy, Navigator, through RAIZ, intends to continue to help Portugal consolidate and expand its position on the European innovation scene in the forest-based bioeconomy.

9.1.2. Risks associated with the production and sale of BEKP pulp, UWF paper and Tissue paper

Supply of raw materials

In 2025, of the total wood supply to the mills for BEKP pulp production, self-supply (wood sourced from Navigator's own forest assets and leased areas) accounted for approximately 12% of total requirements (2024: 13%), with the remaining supply sourced from the domestic market, Spain (Galicia and Andalusia) and non-European markets, namely Brazil (woodchips and roundwood) and Uruguay (woodchips).

As there is not enough Iberian wood to meet our requirements, the import of eucalyptus wood from outside Europe—generally with specific consumption characteristics similar to those of wood sourced in Portugal, albeit with higher logistics costs due to long-distance maritime transport—is essential to bridge the existing supply gap.

In order to increase the availability of domestically sourced wood and given that the establishment of new forest plantations in Portugal is subject to authorisation by the relevant authorities and to policies restricting increases in forest area, which limit national productive potential, Navigator has, in recent years, developed—together with its forest partners—new, innovative and differentiated market initiatives aimed at increasing productivity per hectare. These initiatives are complemented by enhanced technical support for replanting and maintenance operations in eucalyptus stands, forest management certification, investment support for producers, assistance with the acquisition of machinery, among many other initiatives, with a view to increasing future wood supply and contributing to a more productive, organised and resilient forest.

On 31 December 2025, a 10% decrease in the cost per m^3 of eucalyptus wood consumed in BEKP pulp production would have had a negative impact in the Navigator Group's operating results of approximately Euro 36,000,000 (31 December 2024: Euro 37,800,000).

For other raw materials, including chemicals, the main risk identified is the scarcity of products under the growing demand for these products in emerging markets, particularly in Asia and markets supplying them, which can create occasional imbalances of supply and demand.

In this regard, the Navigator Group, together with the Altri Group, established in 2018 a Complementary Grouping of Companies – Pulp Chem, ACE – intended for the joint acquisition of chemical products, benefiting from economies of scale and thus mitigating this risk.

The Navigator Group seeks to mitigate these risks through proactive sourcing, by identifying sources of supply geographically dispersed, whilst seeking to secure long-term supply contracts that ensure volume, price and quality levels consistent with its requirements.

As at 31 December 2025, a 10% worsening in the price of chemical products would have represented a negative impact on the Group's operating results of around Euro 18,000,000 (31 December 2024: Euro 17,300,000).

Water

As water is a key resource in the pulp and paper production process, and in view of growing national concerns regarding its scarcity and/or availability constraints, the Group has placed particular emphasis on its preservation and over recent years, has made investments aimed at reducing water consumption.

As part of the Water Use Reduction Programme (PRUA) implemented by the Group across all its industrial sites, it was possible to reduce specific water consumption at Navigator's industrial sites in Portugal by 8.1% between 2019 (base year) and 2025. The Group expects to reduce the use of this resource by at least 33% by 2030. This is part of a comprehensive strategy that is being pursued rigorously, bringing the Group closer to achieving the goals of its "Agenda 2030".

In addition to reducing the use of water in industrial processes, achieved through major investments, particularly in reuse processes and the closing of circuits, Navigator maintains effective control over the quality of industrial effluents. In this way, Navigator ensures that the quality of its industrial effluents complies with the strict discharge requirements established in the Water Use Permits (TURH) for all industrial sites.

Market Price for UWF paper, BEKP pulp and Tissue paper

Imbalances in the supply/demand ratio in the BEKP, UWF paper and tissue paper markets may have a significant impact on prices and, as a consequence, on the Group's performance. Market prices for BEKP pulp and UWF and Tissue paper are defined by global market competition and have a significant impact on the Group’s revenues and profitability. Price fluctuations for these products primarily result from both changes in supply and demand and the financial situation of each of the different market players (Producers, Traders, Distributors, Customers, etc.), which lead to different and successive equilibrium price levels, thereby increasing volatility in the global market.

The BEKP pulp and paper markets are highly competitive and, under the current market conditions, significant changes in demand and in installed production capacity may have a material impact on prices worldwide. These factors have encouraged the Group to continue pursuing its defined innovation, marketing and branding strategy, as well as to make significant investments in recent years to enhance productivity and to produce differentiated, high-quality products.

As at 31 December 2025, a 10% drop in the price per ton of BEKP pulp and of 5% in the price per ton of UWF paper and Tissue paper sold by the Navigator Group in the period, would have represented an impact on its operating results of approximately Euro 17,600,000 and Euro 84,200,000, respectively (31 December 2024: Euro 23,900,000 and Euro 86,700,000, respectively).

Demand for the Navigator Group’s products

Notwithstanding the references below to the concentration of the portfolio of the Navigator Group’s Customers, any decrease in demand for BEKP, UWF and tissue paper in the European and the United States markets could have a significant impact on the Navigator Group’s turnover. The demand for BEKP produced by the Group also depends on the evolution of the capacity for paper production in the world, since various Navigator Group’s major Customers are themselves paper producers.

The demand for uncoated printing and writing paper has been historically related with macroeconomic factors (*e.g.*, GDP growth, employment, particularly in white collar jobs, confidence indices), technological factors (*e.g.*, penetration of information technologies and hardware/software, notably those related to printing technologies, within the business environment) and demographic factors (*e.g.*, population, average level of education, age structure of society). The evolution of these factors drives the demand for paper positively or negatively, and in the recent past, the trend of paper consumption is negative in the more developed countries and positive or stable in the emerging / developing countries.

Naturally, the performance of the Navigator Group also depends on the evolution of demand in the various markets in which it operates.

Regarding the demand for eucalyptus market pulp, this is largely dependent on the production progress in the non-integrated producers of printing and writing paper, tissue and speciality papers. Chinese demand for this type of pulp represents more than 1/3 of the world's demand, making China one of the most breakthrough drivers of demand.

Regarding Tissue segment, the key variables affecting the demand are:

- Expected future economic growth;
- Population growth and other social and demographic changes;
- Level of development of the service sector, namely tourism;
- Hygiene standards and product penetration levels;

- Developments in the quality of Tissue paper and product specifications; and
- Substitution effects.

Tissue paper consumption is not very sensitive to cyclical economical changes, although it tends to grow faster with higher economic growth. On the other hand, an increase in production costs and, consequently, sales prices can create a downgrading effect on consumption.

The importance of economic growth for the consumption of Tissue is more obvious in developing countries. When the level of the income per capita is very low, the consumption of Tissue tends to be low. There is a threshold after which consumption accelerates. Economic growth allows greater penetration of the product, which is one of the main drivers of demand for such paper in the population with lower incomes. The Tissue paper is a product that does not face major threats of substitution by other materials, and there are no expected changes at this level.

Consumer preferences may have an impact on global paper demand or in certain particular types of paper, such as the demand for recycled products or products with certified virgin fibre.

Regarding this matter, and in the particular case of UWF and Tissue paper, the Navigator Group believes that the innovation, marketing and branding strategy it has been following, combined with the significant investments made to improve productivity and produce high-quality, innovative products, allows it to deliver its products in market segments that are less sensitive to variations in demand, resulting in a lower exposure to this risk.

Energy

The pulp and paper production process are dependent on the constant supply of electric and steam energy. The Group has several cogeneration combined heat and power production units, which supply steam to the process, and redundancies have been planned between the various units in order to mitigate the risk of any unplanned shutdowns.

Moreover, the Group also owns two biomass power plants that are independent of the pulp and paper production process and are dedicated to the production of renewable electricity for sale to the grid.

In 2025, the sale of electricity from renewable cogeneration plants was marked by the commencement of a gradual transition from a full sale-to-the-grid regime to a self-consumption model, with the sale of surplus electricity under market-based arrangements. The Aveiro cogeneration plant, the TG3 cogeneration plant in Figueira da Foz, and the Renovável Papel Setúbal cogeneration plant currently operate under the market-based surplus sales regime, whilst the remaining renewable cogeneration plants sell all the electricity produced to the grid under a feed-in tariff, pursuant to the special remuneration scheme established by Decree-Law 23/2010 of 25 March, as amended. The Setúbal Natural Gas Combined Cycle Power Station remains covered by the general provisions of the same legal instrument.

In 2025, The Navigator Company continued to provide the manually activated Frequency Restoration Reserve Band (mFRR Band) service to consumer agents in accordance with Procedure 15 of the Global System Management Procedures Manual (MPGGS). This service, rendered by electricity consumers authorised for this purpose, aims to contribute to safeguarding the security of supply of the National Electricity System.

The Energy Services Regulatory Authority (ERSE) approved ERSE Directive 6/2025, which sets the Network Access Tariffs (TAR) to be applied to electricity consumption facilities that are granted the Electro-intensive Customer Status. Within this framework, as from 24 April 2025, Navigator’s high-voltage consumption installations benefit from a reduction in the TAR, thereby reducing the cost of electricity purchased from the grid.

As at 31 December 2025, a 10% worsening in the price of electricity would have represented a negative impact on the Group's operating results of around Euro 8,600,000 (31 December 2024: Euro 9,300,000).

Country risk – Portugal

The Navigator Group maintains a strong presence in Portugal, where its main industrial and forest assets are located, making the country the central base of its operational and productive activities. In addition, approximately 20% of the raw materials used by the Group originate from Portuguese forests, reinforcing the Group's reliance on the national territory as a critical productive factor.

The Group plays a significant role in the Portuguese economy, being the country's third-largest exporter and the largest contributor to national value added, accounting for approximately 1% of GDP, around 2.5% of national goods exports and nearly 6% of containerised cargo exported through Portuguese ports. This close integration into the national economy brings benefits in terms of scale and proximity, but at the same time heightens exposure to the country's macroeconomic and institutional environment.

Despite its international focus and the geographical diversification of its target markets, the Group's structural dependence on Portugal in terms of productive factors, as well as the regulatory, tax, labour, environmental and energy frameworks, exposes the Group to Portugal's sovereign risk profile. Changes to this framework, as well as to its interpretation and application by regulatory and government authorities, may have material impacts on competitiveness, operating costs and business profitability.

The Group continuously monitors developments in the national economic and regulatory environment, seeking to mitigate this risk through the diversification of sales markets, operational efficiency, active management of its forest base, and institutional dialogue with the relevant authorities. Nevertheless, the significant concentration of assets and operations in Portugal constitutes a structural risk factor that requires continuous monitoring.

Country risk – Mozambique

Due to the investment in the Mozambican project, the Navigator Group is exposed to the specific risk in this country. However, consideration has been given to investments in terms of timing, choice of suppliers/partners and geographical location, taking this risk into account, and the Group ensures that these steps are taken with reasonable certainty that there will be no effects arising from the risk. As a result of the elections that took place in the fourth quarter of 2024, and the political and social instability that followed, the Company continues to monitor and assess the need for any potential adjustments.

At this moment, the Mozambique project is essentially a forestry project, with an option to develop an industrial project. The planned investment will be implemented in two phases, the first being a ship production (woodchip) project and a second phase the construction of a pulp mill. The Group is, however, prepared to move forward with the forestry plan foreseen, once the necessary conditions—most of which are under discussion with the Mozambican authorities—are met.

Until 31 December 2025, the expenses incurred in this project amount to Euro 148.8 million (31 December 2024:

Euro 142.2 million), mainly related to plantation, land preparation and forest maintenance, to the programme for land management, environmental and social licensing, training, and the construction of what is now one of Africa's largest forest nurseries.

Considering that Navigator is still working on the conditions above for Phase 1 of the MoU, as previously mentioned, the estimated probable liabilities are duly provisioned.

Country risk – US

The US market represents a significant weight in the total turnover of UWF paper, resulting in a material exposure of the Group to country-specific risk associated with this market.

This exposure requires continuous monitoring and a careful assessment of the potential impacts arising from changes in the regulatory, trade, tax and customs framework, as well as from their application and interpretation by US governmental bodies and tax authorities, which may affect the competitiveness and profitability of the Group's operations.

In addition, the Group is exposed to the risk associated with the imposition or amendment of customs tariffs by the United States of America, within the scope of its external trade policy. The introduction, revision or increase of tariffs on imported products, including paper and forest-based products, may result in increased costs upon entry into the market, with potential impacts on final prices, sales volumes and operating margins, as well as on competitiveness vis-à-vis local producers or producers from other regions.

In the context of international trade, and in line with developments affecting producers from other regions (namely Australia, Brazil, China and Indonesia), the Group has been subject, since 2015, to anti-dumping measures applicable to imports of UWF paper into the United States, as determined by the United States Department of Commerce. These measures involve the imposition of anti-dumping duties on exported goods, representing an additional risk factor with a potential impact on the commercial strategy, export volumes and the profitability of the business in that market.

Country risk – United Kingdom

With the acquisition of the tissue business in the United Kingdom, the Navigator Group increased its exposure to UK macroeconomic risk, including foreign exchange risk associated with pound sterling and greater sensitivity to the local economic cycle.

The United Kingdom has shown moderate growth following the recent inflationary cycle, while interest rates set by the Bank of England remain relatively restrictive, resulting in higher financing costs and some pressure on consumption. Nevertheless, the tissue sector continues to display a more defensive profile, albeit subject to margin pressure in a context of heightened price sensitivity on the part of retailers and consumers.

In light of these challenges, it should be noted that the Navigator Group has been mitigating the aforementioned risks through integrated management of its production value chain, from pulp production to tissue paper manufacturing and conversion into finished products. This approach enables greater cost control, operational efficiency and resilience to raw material price volatility.

Concurrently, the proactive management of foreign exchange exposure, leveraging both short and long positions in GBP and USD, contributes to reducing the Group's net exposure to foreign exchange risk. In addition, commercial and management synergies, as well as integration gains arising from the incorporation of the UK tissue operations into the Group's perimeter, further strengthen value capture capabilities and risk dilution within a more demanding macroeconomic environment.

Competition

Increased competition in the paper and pulp markets may have a significant impact in price and consequently, in the Group's profitability.

The pulp and paper markets are highly competitive and thus the entry into the market of new production units with increased available production capacity could have a relevant impact on prices worldwide.

BEKP producers from the southern hemisphere (namely from Brazil, Chile, Uruguay and Indonesia), with significantly lower production costs, have been gaining weight in the market, undermining the competitive position of European pulp producers.

In addition, by the end of 2026, the start-up of new capacity in Indonesia is expected (1.4 Mt of short-fibre pulp, of which 50% integrated). Subsequently, in 2027, Arauco announced the start-up of 3.5 Mt of short-fibre pulp under the Inocência project in Brazil (Mato Grosso do Sul).

These factors have forced the Navigator Group to make significant investments in order to keep production costs competitive and produce high-quality products as it is likely that this competitive pressure will remain strong in the future.

There has been some disinvestment in the paper sector in the US and Europe, with closures/conversions of installed capacity by some UWF producers, in a clear attempt to adjust supply according to the negative evolution of demand. On the contrary, investments in new UWF capacity in China in the short- and medium-term have occurred and are expected.

The Navigator Group has been adjusting its commercial strategy to the evolution of regional consumption patterns and, although Europe remains its main market, it now has a significant presence in the United States and North Africa.

The turnover intended to the European markets represented 60% (2024: 62%), achieving particularly strong market shares in Western European countries and relevant market shares in the other main European markets.

Concentration of Customers' portfolio

As at 31 December 2025, the Group's 10 main BEKP Customer groups accounted for 14% of the period's production of BEKP pulp (2024: 12%) and 60% of external sales of BEKP pulp (2024: 45%). This asymmetry is a result of the strategy pursued by the Group, consisting of a growing integration of the BEKP pulp produced into the UWF, Packaging and Tissue paper produced and sold. Nevertheless, the Group believes there is little exposure to risks of Customer concentration in the marketing of BEKP pulp.

In 2025, the Navigator Group maintained its dependence on its 10 largest UWF Customer groups compared to 2024, which accounted for 32% (2024: 35%) of the Group's sales volume.

The Navigator Group recorded 141 (2024: 146) new paper Customers with sales in 2025. Also, regarding UWF paper, the Group follows a strategy for mitigating the risk of concentration in its customer portfolio. The Navigator Group sells UWF paper to 127 countries and to around 1,000 individual Customers, thereby allowing a dispersion of the risk of sales concentration in a reduced number of markets and/or Customers.

Of particular note is the NVG Hub e-commerce portal, launched in 2021, which, at the end of 2024, introduced an online business model for pallet-based sales, with delivery times ranging between 24 and 72 hours, targeting smaller-scale customers in selected regions across Europe. In 2025, NVG Hub consolidated its position as a strategic sales channel, reaching approximately Euro 300 million in online orders, and is now available across all business units: UWF, Tissue, Moulded Pulp and Pulp. It also reinforced its commitment to more transparent and efficient communication with customers through the launch of strategic features, such as a new alert system and proactive order-tracking tool. It is also preparing the launch of an auction tool (or online bidding platform) for the sale and management of old stock.

In the Packaging business line, the expansion of the offering remains ongoing, with the consolidation of new product ranges that will open up significant opportunities in higher value-added segments in the short term; this development is supported by market testing (233 in 2025, +17% vs. 2024), involving 116 customers and potential new customers (33 tests with 19 regular customers, and 200 tests with 97 potential new customers). Of the tests initiated in 2025, six are still ongoing.

The year 2025 got off to a relatively slow start; however, demand improved at more favourable levels throughout the year and ended in line with expectations (the European kraft paper market grew by 2.6% compared to 2024), with Navigator recorded growth of 11% (vs. 2024) and confirmed a CAGR of 13% per annum.

The development of the packaging business continues to show very promising signs, reflected in the growing customer base, the recognition of the quality of our Globulus eucalyptus fibre-based products and, consequently, of the gKraft™ brand, which serves brands with high exposure in sectors as diverse as fashion, food retail, e-commerce, industry and agriculture.

This recognition is reflected in the growth of the customer base, which now exceeds 443 customers (with sales) across 52 countries, since the inception of the business. This recognition goes beyond commercial success: Navigator's work in the field of sustainable packaging solutions was distinguished, in 2023, with the National Innovation Award. In turn, the "From Fossil to Forest – Produtos de Embalagem Sustentáveis para Substituição do Plástico Fóssil" mobilising agenda led by Navigator was recognised by Deloitte Portugal in the "Transformation Award – Projetos de transformação e de inovação com impacto no mercado" category.

Navigator bases its packaging paper offer on three macro gKraft™ segments: BAG, FLEX and BOX, which are further divided into 10 segments for different applications, catering respectively to the Bags market (retail, consumer and industrial bags), the Flexible market (covering a wide range of flexible packaging applications for food and non-food uses, including packaging for filling industries such as sugar, flour and rice packs, base substrates for adhesives known as release liners, and multilaminates incorporated into facings of thermal, acoustic and electrical insulation products, among others), and the Boxes market (corrugated cardboard boxes for value-added products and food packaging, such as pizza boxes). These are products in which the innovative introduction of eucalyptus fibre qualities has been crucial to the enormous market acceptance already recognised.

Navigator has continued to develop new product ranges and grammages (especially low grammages) aimed at the food industry and a wide range of consumer products, whose testing and launch phase, which is still underway, represents a large-scale operation to reach new customers, supported by 233 market tests carried out in 2025. Developments included the creation of new product ranges, in particular innovative 100% eucalyptus products, and the extension to weights of up to 35 g/m2.

As part of the diversification of the Packaging business, the project for the integrated production of eucalyptus-based moulded cellulose parts to replace single-use plastic packaging in the food service and food packaging market continues to progress as planned, having entered production expected in the fourth of 2024 under the gKraft™ Bioshield brand. The plant will have a production capacity of around 2,000 tonnes per year, making it one of the largest in Europe and the first integrated plant in Southern Europe, entering a market with high potential and growth. Production started with 5 products for single-use applications in the food sector that are fully recyclable and/or compostable: 22cm plate, 17cm plate (dessert), 500ml bowl, 1 litre take-away container, tray (laminated for raw protein – beef, pork and poultry), fruit basket and espresso cup.

These 5 products have the production flexibility and scalability to take advantage of the many opportunities opening up to replace single-use plastics and aluminium. Concurrently, new products have been developed in partnership with national and international customers, and research and development work continues into new sustainable barrier property solutions, as well as testing commercial solutions.

It should be noted that, in addition to certification of compliance with European Regulation (EC) 1935/2004 (food contact), our moulded pulp products under the gKraft™ Bioshield brand have also been certified as compliant with the German BfR Recommendation XXXVI, the leading international benchmark for cellulose fibre-based food packaging. Our gKraft™ Bioshield products thus become the first moulded fibre products in the world to comply with the BfR XXXVIA recommendation. This certificate was issued by the prestigious German laboratory ISEGA. The certification enables the commercialisation of products intended for the food segment, for contact with greasy, wet and dry foods, and applies to our entire tableware and take-away range.

Packaging business volumes amounted to over 89 ktonnes in 2025 (in line with the 2022 volumes, an exceptional year of post-pandemic demand, and reaffirming a growth rate above the market (+11% versus +2.6% for the European market)), reflecting the strong market acceptance of gKRAFT products. This performance translated into sales revenue of Euro 79 million (2024: Euro 75 million).

During 2025, Navigator's Tissue sales volume (finished products and reels) reached 231 thousand tonnes, recording a 5% increase compared to 2024, with sales value growing by 6%.

This growth was supported by the integration of the Navigator Tissue UK business, completed in May 2024, which, in addition to enhancing product range and driving sales growth, also broadened the customer base and generated integration synergies. These synergies enabled the development of cross-selling initiatives, thereby strengthening commercial relationships with customers.

The integration of the UK operation is ongoing, with strengthened collaboration between the local teams and those in Iberia, aimed at leveraging cross-selling opportunities across markets, optimising the portfolio towards higher-margin products, attracting new customers and, simultaneously, reviewing the cost structure to make the operation more efficient.

International sales in the Tissue business accounted for 80% of total sales volumes in 2025 (compared with 54% in 2022, prior to the integration of Tissue Ejea and Tissue UK). The most significant markets were the UK, representing 34% of total sales, Spain with 30%, and France accounting for 14% of sales. Over the past two years, the acquisition of new units in Spain and the United Kingdom have enabled a more balanced geographic mix, providing greater business resilience, which focuses primarily on finished products (accounting for 98% of total sales, while rolls accounted for 2% of total sales).

With regard to customer segment stratification, the At Home or Consumer (retail) segment has recorded a growing share, currently representing approximately 83% of sales, while the Away from Home segment (wholesalers – HoReCa and offices channel) accounts for the remaining 17%.

9.1.3. Risks associated with the production of energy

In 2025, the macroeconomic environment remained unstable, influenced by geopolitical tensions, particularly the war in Ukraine and the conflict in the Middle East. Against this backdrop, natural gas prices showed relative stabilisation compared to the historical peaks observed during the 2022 energy crisis, although they remained above pre-crisis levels. This reflects a more balanced market, albeit one that remains sensitive to geopolitical factors. With regard to electricity prices, the marginal pricing market structure of MIBEL remains exposed to price fluctuations linked to natural gas indices, whilst there has also been a growing influence from renewable assets, such as solar and wind power.

The production of electricity is an important activity for the Group, enabling the valuation of an endogenous renewable resource, the biomass generated in the production of BEKP pulp. The energy generation assets also allow the Group's wood suppliers to generate additional income from the sale of residual forest biomass from their farms, and in this way contribute to reducing the risk of fire in the country.

The Group has played a pioneering role and has been promoting and developing a market for the sale of biomass for supplying its renewable cogeneration units and biomass power plants. The fostering of this market in a phase prior to the start-up of the new power-generating units has enabled it to secure a sustained raw-material supply network.

Existing incentives in Portugal only cover the use of residual forest biomass (RFB) for electricity generation, excluding the use of wood for this purpose.

In terms of legal framework, we highlight the following diplomas:

i. Decree-Law 68-A/2015 of 30 April, which establishes provisions on energy efficiency and cogeneration and amends Decree-Law 23/2010, of 25 March, and Order 140/2012, of 14 May, revised by Order 325-A/2012, of 16 October, applicable to the regime of PRE- Special Regime Production in cogeneration;
ii. For the For the Biomass Power Plants (CTB) in operation, dedicated to the production of electricity the legal framework is supported by Decree-Law 33-A/2005, of 16 February, revised by Decree-Law 225/2007, of 31 May, which changes the guaranteed remuneration period for Special Regime Production (PRE) from 15 to 25 years. For these assets, the legal framework thus supports a tariff framework that is expected to be stable over the coming years.

iii. Decree-Law 15/2022 of 14 January, in its consolidated version currently in force, which establishes the organisation and operation of the National Electricity System (SEN), transposing Directive (EU) 2019/944 and Directive (EU) 2018/2021.

The Group seeks to mitigate the risks associated with its activity by constantly striving to optimise production costs and improve the efficiency of its power generation units, assessing new renewable energy generation projects, long-term energy contracting and active risk management, as well as promoting several photovoltaic solar energy projects under self-consumption schemes.

9.1.4. Environmental risks

Regulatory environment

In recent years, environmental legislation in the EU has become increasingly restrictive regarding the control of effluents. The companies within the Group comply with the current legislation in all aspects of their environmental licensing, specifically in adhering to the various environmental parameters for which Emission Limit Values (ELVs) are established.

In 2025, under the Single Environmental Licensing Regime, in accordance with Decree-Law 75/2015, of 11 May, the Group's industrial facilities continued to fully comply with their Environmental Licences – Single Environmental Permits (TUA), which bring together, *inter alia*, water resources use permits (TURH) and greenhouse gas emission permits (TEGEEs). During 2025, the Group prepared and duly submitted the procedures for updating certain Environmental Use Permits, with a view to regularising the decarbonisation projects currently under implementation.

In response to the decarbonisation challenge, the Group continues to implement its Environmental Strategic Plan and an ambitious Carbon Neutrality Roadmap, aimed at introducing, by 2035, changes to its manufacturing processes in order to minimise the use of fossil fuels and, consequently, reduce its CO_2 emissions.

To this end, the roadmap defined in 2019 includes projects based on the use of renewable energy sources, namely biomass and solar, with the aim of minimizing CO2 emissions resulting from its activity and promoting the improvement of its energy performance. The Roadmap sets out an 86% reduction in fossil fuel emissions from its industrial activities covered by the EU Emissions Trading Scheme (EU ETS) by 2035, compared to 2018 levels, with a reduction of 37% already achieved by 2025.

Furthermore, in compliance with Decree-Law 147/2008 of 29 June, which transposed Directive 2004/35/EC into national legislation, the Group maintains the environmental insurance coverage required under that legal framework, thereby ensuring compliance with the applicable regulations and mitigating the environmental risks to which it is exposed.

With regard to developments in the European Union Emissions Trading Scheme (EU ETS), Directive (EU) 2023/959 of 10 May was adopted, further amending Directive 2003/87/EC, as previously amended by Directive (EU) 2018/410 of 14 March, with a view to enhancing the cost-effectiveness of emissions reductions and promoting investment in low-carbon technologies.

Directive (EU) 2018/410 sets out, among other things, the new EU ETS period to be in force between 2021-2030, which will show a reduction in the amount of CO_2 emission allowances allocated free of charge.

Directive (EU) 2023/959 introduces far-reaching changes to the EU Emissions Trading Scheme (EU ETS), notably by extending the mechanism to the maritime transport sector and by establishing EU ETS II, focused on the buildings, road transport and other industrial sectors previously not covered.

This development has led to increased costs for the transformation industry in general and in particular for the paper and pulp industry, without any compensation for the CO_2 absorption annually provided by the forests associated with this industry.

In order to mitigate the impact of this change, the Group has long undertaken a series of investments of an environmental nature that, among other advantages, have allowed the continued reduction of CO_2 emissions.

Under the General Waste Management Regime established by Decree -Law 102-D/2020, of 10 December, as amended by Rectification Statement 3/2021 and by Law 52/2021, of 10 August, Navigator continues to make efforts to establish partnerships that enable the recovery of waste produced at its industrial sites, in line with the circular economy approach. In 2025, it successfully implemented a significant circularity project involving the use of screened ash from a biomass boiler for the production of mortars.

The Navigator Group monitors the European Commission's policy and legislative initiatives in areas such as the EU forestry and biodiversity strategies, the Renewable Energy Directive, the EU Emissions Trading System (EU ETS) as well as the EU Taxonomy, the Non-Financial Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD).

The publication in the Official Journal of the European Union of the Corporate Sustainability Reporting Directive (CSRD) - Directive (EU) 2022/2464 established the sustainability reporting requirements for a broader range of companies, through the European Sustainability Reporting Standards (ESRS). Based on the criteria established in this context, Navigator reported its non-financial information for FY24 in accordance with the ESRS standards. With regard to FY25, and notwithstanding the simplifications to the reporting requirements of these standards agreed in December 2025 – aligned with the European objective of regulatory simplification under the CSRD Omnibus review – the Company chose to maintain the structure and level of detail of its reporting.

Nevertheless, Navigator carried out a minor revision of its double materiality assessment, while maintaining alignment of its non-financial reporting on material impacts, risks and opportunities, in accordance with the CSRD, as presented in the Non-Financial Statements section of this Report.

Aiming to create a positive impact on People and the Planet, Navigator has maintained its commitment to fulfilling the commitments of its 2030 Agenda for responsible business management and achieving the corresponding objectives, integrated into the 2030 Roadmap and aligned with the Sustainable Development Goals (SDGs).

Among the goals of the 2030 Roadmap, those that contribute to combating Climate Change stand out, supporting SDG 13 (Climate Action) In this context, the Group has a transition plan for climate change mitigation that incorporates a resilience analysis across three climate scenarios and two-time horizons, aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

The Group is investing in a decarbonisation roadmap which includes, amongst other measures, the replacement of fossil fuels with sustainable biomass, the strengthening of renewable biomass-based cogeneration, and the expansion of solar photovoltaic power generation.

The Company has established three specific targets to reduce greenhouse gas (GHG) emissions: - an 86% reduction in emissions under the EU ETS by 2035, compared to 2018;- a 63% reduction in absolute Scope 1 and Scope 2 emissions by 2035, compared to 2020; and - a 37.5% reduction in absolute Scope 3 emissions by 2035, compared to 2020. The latter two targets were approved by the Science Based Targets initiative (SBTi) in 2022. The target relating to Scopes 1 and 2 is aligned with the 1.5°C goal established by the Paris Agreement. According to the Science Based Targets initiative (SBTi), these science-based greenhouse gas (GHG) emissions reduction targets are a “key element” of a net-zero decarbonisation pathway, as advocated in the reports of the Intergovernmental Panel on Climate Change (IPCC).

Since 2023, the Navigator Group has reported information on the eligibility, alignment and financial performance indicators of its economic activities under the EU Taxonomy, although pulp and paper production activities are not yet considered eligible.

As a bioindustry on the right side of the future, based on the eucalyptus and pulp and paper industries, we promote a forest-based bioeconomy with potential positive impacts based on the sustainable management of our forests.

Good management of environmental, social and governance (ESG) risks and opportunities has led the Company to once again be distinguished as "ESG Industry Top Rated" based on the assessment of the Sustainalytics rating agency and is classified as a "Low ESG Risk Company" for Investors. Also, in the assessment carried out by CDP (formerly known as the Carbon Disclosure Project), Navigator maintained its position as a world leader in combating climate risks and deforestation, achieving an "A" rating in both CDP Climate and CDP Forests. This performance earned the Company inclusion in the exclusive CDP "A-List" of companies.

For more detailed information on these and other initiatives under the Navigator Group's 2030 Agenda, we recommend consulting the Non-Financial Statements section in this Report.

9.1.5. Human resources and talent management

In 2025, work continued on consolidating the Talent Management policies and processes that have been designed, digitised and implemented in recent years. Following the implementation of the policies governing the Performance & Careers area, 2025 was marked by the communication of the Career Paths & Mobility Model, applicable to employees covered by the Job Family Model.

The following stand out as relevant steps to meet the needs of employees and the challenges of the market:

- The Group continued to implement its young talent attraction programmes, aimed at meeting the future needs of the Navigator Group while simultaneously enhancing the employability of young people, namely through:
    - 67 internships for graduates and postgraduates;
    - 134 professional internships / operator training programmes. In 2025, the training pathway for future Operational Technicians, developed in partnership with the Institute for Employment and Vocational Training (IEFP), was revised to introduce a new format designed to make the programme more attractive to young people, by eliminating the internship component and extending the practical training component. This new model is designated the Operators Course.
    - 44 summer internships, including a corporate social responsibility component for employees' children; and
    - 42 curriculum development internships in corporate areas, industrial production techniques and laboratories.
- Strong engagement of our internal ambassadors in the Group's employer branding strategy, through active participation in university job fairs.
- Continuation of the communication regarding the new model for career progression and professional paths aimed at the Company's staff, in line with the Job Family Model, with the aim of clarifying career paths and internal development opportunities, by defining and ensuring transparency regarding the associated criteria. We digitalised the information relating to the Job Family Model and the Mobility & Career Paths Model and launched a pilot of a digital platform covering approximately 600 employees.
- The communication phase of the Potential Assessment and Succession Planning process was initiated for employees included in Phase I of the process, clarifying to our people how the organisation views their professional development, defining effective development and progression plans, and ensuring growth within the Company and the Group. Simultaneously, Phase II of the process was launched, extending its scope to a further approximately 200 employees.
- Within the scope of remuneration policies and practices, a remuneration benchmarking exercise was carried out in 2025 for EJEA management roles, together with an update of the salary bands applied to management positions in Portugal and in international markets. Ongoing communication with the business and with employees was maintained, along with knowledge-sharing sessions with the HR community (DGT and DRH)

regarding remuneration policies. Lastly, progress was made in the process of integrating and aligning EJEA processes with the remuneration-related policies in place at NVG (performance-related pay, bonuses and company vehicles).

- With regard to training, particular emphasis is placed on the average number of training hours per employee, which amounted to 109 hours in 2025, covering virtually the entire workforce.

- Implementation of various internal programmes to mobilise teams, generate ideas and bring them closer to the company's strategy and the Board of Directors, namely *Dia do Trainee, Future Leaders Fórum, Straight to the Top - revamp, Lembranças de Antiguidade, Fórum de Supervisores; Desafio Super Zero*.

- Implementation of programmes focused on the families of our employees, such as: Holiday camps (for employees' children) and Navigator Tours for family members, including children under 12, with specific, age-appropriate activities.

- The CRESCER project continued with the aim of having "committed and fulfilled" people, always in line with the company's purpose. Since the launch of the project, more than 100 employees have been involved to ensure that the initiatives to be implemented were fully tailored to the organisation's reality, while fostering an increasingly robust dynamic of proximity and interaction. Particular emphasis should be placed on the results of certain initiatives, namely:
    - Lead Programme, a programme to develop leadership skills and transform teams, applied to all directors and EC, and extended to a further 106 leaders in 2025;
    - Navigator Excellence, a recognition programme aimed at fostering a cross-organisational culture of recognition by acknowledging and thanking excellence, while promoting pride and motivation among employees – approximately 990 recognitions were recorded in 2025.
    - Launch of the Mobility and Career Paths Booklet and the Training Catalogue, both integrated into the Employee Handbook;
    - Navigator Referral Programme, which enables Navigator employees to refer external candidates to the organisation – more than 120 referred applications were submitted and a first prize was awarded in 2025 following a successful referral;
    - Navigator's participation in the 5th Multicare Vitality Run, which was attended by over 90 Navigator employees and their families, where the Group achieved first place on the podium in the intercompany race;
    - Update of the travel policy and implementation of the Navigator car-sharing system, enabling the sharing of business trips among colleagues, contributing to sustainability, improved vehicle occupancy rates, cost optimisation and the strengthening of internal networking;

- The Employee Climate Survey was conducted, achieving a participation rate of 79% and covering all employees.
- With a focus on the future and with the families of our employees in mind, we celebrated the awarding of merit scholarships to the children of our employees who excelled in higher education, under the motto "investing in the future means supporting those who are building tomorrow".

- The year was also marked by the holding of two Labour Forums, with the participation of Navigator's Executive Committee and employees' representative organisations, serving as a platform for the sharing and discussion of topics considered strategic for employees and for the Company's future.
- We reviewed the Career Plan for our operational technicians, highlighting, amongst other measures, the enhancement and acceleration of career progression – which translates into an attractive pay scale – as well as a reduction of approximately 20% in the training hours related to acquiring specialist skills in the field of Maintenance, amongst other measures.

- With the aim of being increasingly closer to our employees, a new telephone hotline was created, extending the service period and allowing employees to contact the HR team outside normal working hours for clarification of queries. This solution was designed particularly with shift workers and night-shift employees in mind.

- Negotiations with employees' representative bodies were concluded, resulting in an agreement covering the years 2026 and 2027, which reflects Navigator's ongoing commitment to valuing its people, improving working conditions and ensuring the sustainability of its industrial operations, while providing stability and predictability for the next two years.

9.1.6. Information Systems and Cybersecurity

In 2025, Information Systems continued to play a key role in supporting Navigator's industrial and corporate operations, while simultaneously strengthening the resilience and security of its technological infrastructures. The evolving regulatory requirements and the increasing complexity of digital threats were key drivers behind the further enhancement of cybersecurity policies and procedures, aligned with international standards and with the requirements arising from the NIS2 Directive.

The Group continued to strengthen its protection, detection and incident response mechanisms, including regular awareness-raising initiatives and the ongoing review of application and infrastructure controls, across both IT and OT environments. The outsourced service delivery model remained essential to ensuring operational continuity and access to specialised skills, complemented by the reinforcement of internal technological governance capabilities.

In the field of digital transformation, several strategic projects were implemented aimed at modernising core systems, improving operational efficiency, expanding analytical capabilities and enhancing integration across business support platforms. These initiatives contributed to increasing the Group's technological maturity and strengthening its responsiveness within an increasingly demanding operating environment.

9.1.7. Other risks associated with the Group's activity

The Group's manufacturing facilities are subject to risks inherent to any industrial activity, such as accidents, breakdowns or natural disasters (see Note 1.2 – Subsequent events) that may cause losses in the Group's assets or temporary interruptions in the production process.

Likewise, these risks may also affect the Group's main Customers and Suppliers, which would have a significant impact on profitability levels, should it not be possible to find replacement Customers to ensure sales levels or Suppliers to preserve the cost structure.

The Navigator Group primarily exports its production of UWF paper and Tissue paper. Consequently, transportation and logistics costs are materially relevant. A continuous rise in transportation costs may have a significant impact in its earnings.

9.1.8. Context risks

The structural inefficiency of the Portuguese economy, which continues to be followed by management, adversely affects the Group's competitiveness, mainly in the following areas:

i. Ports and railroads;

ii. Roads, particularly those providing access to the Navigator Group's mills;

iii. Territorial planning and forest fires;

iv. Low productivity of the country's forests;

v. Lack of certification of most of the Portuguese forest; and

vi. Volatility of the fiscal policy and no reduction of the IRC rate, as well as non-elimination of the surcharges.

10. Provisions, commitments and contingencies

10.1. Provisions

Movements in provisions

Amounts in Euros	Legal proceedings	Other provisions	Total
As at 1 January 2024	**7,509,334**	**20,327,950**	**27,837,286**
Increases	462,589	169,728	632,317
Reversals	(600,139)	-	(600,139)
Impact on profit or loss for the period	**(137,550)**	**169,728**	**32,178**
Charge-off	-	15,339	15,339
Other transfers and adjustments	345,255	141,011	486,266
As at 31 December 2024	**7,717,039**	**20,654,028**	**28,371,069**
Increases	739,290	675,447	1,414,737
Reversals	(508,240)	(4,470,153)	(4,978,393)
Impact on profit or loss for the period	**231,050**	**(3,794,706)**	**(3,563,656)**
Charge-off	-	(19,307)	(19,307)
Other transfers and adjustments	453,356	185,535	638,891
As at 31 December 2025	**8,401,445**	**17,025,550**	**25,426,997**

No repayments of any nature are expected in respect of these provisions.

Legal proceedings

The outcome of provisions for legal proceedings depends on the labour or civil court decisions.

The balance as at 31 December 2025 and 2024 is mainly composed of amounts relating to labour lawsuits and lawsuits with APA – Portuguese Environment Agency regarding the water resources rate.

Other provisions

The amount presented includes provisions to cover risks related to events of a different nature, the resolution of which may result in outflows of cash, in particular organisational restructuring processes, risks of contractual positions assumed in investments, among others.

In 2025 and 2024, Other provisions includes the amounts of Euro 15,843,085 and Euro 15.594.728, respectively, related to the Mozambique project. Although the Memorandum of Understanding (MoU) signed with the Mozambican Government provided for a "best effort" commitment to create the necessary conditions to carry out the investment until last 31 December 2018, that was not possible until 31 December 2025, and both parties continued to work towards that goal.

The Group's balances relating to income tax uncertainties are disclosed in Note 6.1 – Income tax.

Estimates and judgements

Legal and tax proceedings

These provisions were made in accordance with the risk assessments carried out internally by the Group with the support of its legal advisers, based on the probability of the decision being favourable or unfavourable to the Group.

Accounting policies

Provisions are recognised whenever the Group has a present legal or constructive obligation, as a result of past events, in which it is probable that an outflow of resources will be required to settle the obligation and the amount has been reliably estimated.

Provisions for future operating losses are not recognised. Provisions are reviewed on the date of the statement of financial position and are adjusted to reflect the best estimate at that date.

The Group incurs expenditure and assumes liabilities of an environmental nature. Accordingly, expenditures on equipment and operating techniques that ensure compliance with applicable legislation and regulations (as well as on the reduction of environmental impacts to levels that do not exceed those representing a viable application of the best available technologies, on those related to minimising energy consumption, atmospheric emissions, the production of residues and noise), are capitalised when they are intended to serve the Group's business in a durable way, as well as those associated with future economic benefits and which serve to extend the useful lives, increase capacity or improve the safety or efficiency of other assets owned by the Group.

10.2. Commitments

Guarantees provided to third parties

Amounts in Euros	2025	2024
Guarantees provided		
Navigator guarantees for EIB loans	8,333,333	11,666,667
Ocean Network Express	2,751,947	2,751,947
Portuguese Tax Authorities (AT)	12,788,455	9,288,070
Comissão Coordenação Desenvolvimento Regional	677,718	354,083
Agência Portuguesa Ambiente	3,908,912	3,337,887
Simria	338,829	338,829
Other	800,482	1,193,505
	29,599,676	**28,930,988**

In the first half of 2024, a bank guarantee was set up in favour of the Tax Authority in the amount of Euro 9,288,070, which stood at Euro 8,731,219 as at 31 December 2025, following the notification received by The Navigator Company at the end of 2023 relating to an additional Corporate Income Tax (CIT) assessment for 2019 arising from adjustments identified during a tax inspection.

Additionally, in the second half of 2025, a new guarantee was provided in the form of a surety bond in the amount of Euro 4,057,237, as a result of the notification received by The Navigator Company relating to an additional Corporate Income Tax (CIT) assessment for 2021, arising from adjustments identified during a tax inspection.

The Group decided to challenge these additional assessments and refrain from payment and from setting up this bank guarantees.

In the case of the Portuguese Environment Agency, bank guarantees were provided in the context of proceedings in litigation associated with the water resources rate for the years 2017 to 2022.

Purchase commitments

Amounts in Euros	2025	2024
Purchase commitments		
Property, plant and equipment - Industrial equipment	88,414,507	145,451,837
Energy	94,063,400	103,786,050
Wood		
Commitments to acquisitions in the subsequent period	246,700,000	251,400,000
Commitments to long-term acquisitions	54,000,000	56,900,000
	483,177,907	**557,537,887**

The Navigator Group's subsidiary Abastecimento de Madeira, ACE, signed a contract with Portline Ocean Bulk, Inc. for the chartering of ships to transport 940,000m^3m, initially planned for the period 2022, 2023 and 2024, which was extended to 2025 and 2026 without changing the overall volume to be transported.

Purchase commitments of an operational nature, which are not reflected in the statement of financial position, include liabilities associated with long-term contracts for the supply of raw materials, products and services within the scope of The Navigator Company's activity. The value of the commitments has been estimated on the basis of the information available at the time, based on the contractual terms and the best information available at the time on the volumes and prices applicable for the remaining period of the contracts.

Other commitments

The Navigator Group has made a commitment to achieve carbon neutrality by 2035, with an estimated global investment of Euro 340 million, of which Euro 318.1 million have already been invested until 31 December 2025 (2024: Euro 232.2 million.

10.3. Contingent assets and liabilities

Public debt settlement fund

According to Decree-Law 36/93 of 13 February, the tax debts of privatised companies relating to periods prior to the privatisation date (25 November 2006) are the responsibility of the Public Debt Settlement Fund (FRDP). The Navigator Company submitted an application to the FRDP on 16 April 2008, requesting the payment of the tax debts until then settled by the Tax Authorities. On 13 December 2010, The Navigator Company presented a new application requesting the payment of debts settled by the tax authorities regarding 2006 and 2003. This application was supplemented on 13 October 2011, with the amounts already paid and uncontested regarding these debts, as well as with expenses directly related to them, pursuant to court ruling dated 24 May 2011 (Case 0993A/02), which confirmed the Company's position regarding the enforceability of such expenses.

On 13 December 2017, The Navigator Company, S.A. has made an extra-judicial agreement with the Tax Authorities, in which it was acknowledged the FRDP responsibility for refunding the amount of Euro 5,725,771 corresponding to the amount of Corporate Income Tax (IRC) unduly paid, resulting from the alleged qualification/incorrect consideration, by the Tax Authorities, of the tax loss calculated as a result of the operations performed by Soporcel, S.A. in 2003, as well as to promote the reimbursement to Navigator of the mentioned amount.

In January 2023, the Court, while rejecting in their entirety the defendants' pleas in law, issued a judgement against the Navigator Group and acquitted the defendants of the claim relating to the 2006 aggregate corporate income tax. Following this decision, the Group appealed to the Supreme Administrative Court in February 2023.

Navigator was notified on 12 December 2024 of a ruling that upheld the formal objection raised by the Defendants and acquitted them of the claim relating to the aggregate corporate income tax for 2001 to 2005. Navigator was notified on 12 December 2024 of a ruling that upheld the formal objection raised by the Defendants and acquitted them of the claim relating to the aggregate corporate income tax for 2001 to 2005. Following this decision, the Group filed an appeal with the Central Administrative Court - South on 28 January 2025.

In this context, FRDP is liable for Euro 21,853,377, detailed as follows:

Amounts in Euros	Period	Requested amounts	Decrease due to RERD	Proceedings decided in favour of the Group	Outstanding amounts
Proceedings confirmed in court					
Corporate Income Tax	2002	18,923	-	-	18,923
Corporate Income Tax (RF)	2004	3,324	-	-	3,324
Corporate Income Tax	2004	766,395	-	(111,544)	654,851
Expenses		314,957	-	(314,957)	-
		1,103,599	**-**	**(426,501)**	**677,098**
Proceedings not confirmed in court					
Corporate Income Tax	2005	11,754,680	(1,360,294)	-	10,394,386
Corporate Income Tax	2006	11,890,071	(1,108,178)	-	10,781,893
		23,644,751	**(2,468,472)**	**-**	**21,176,279**
		24,748,350	**(2,468,472)**	**(426,501)**	**21,853,377**

Regarding the aggregate corporate income tax proceedings of 2005 and 2006, as indicated in Note 6.1, if Courts come to a decision in favour of Navigator Group, the Group will withdraw the request made to FRDP.

Public Debt Settlement Fund - Proceeding 774/11.3 BEALM

Additionally, a new petition was filed in the Administrative Court of Almada on 11 October 2011, which called for the repayment of various amounts, amounting to Euro 136,243,949. These amounts regard adjustments in the financial statements of the Group after its privatisation that had not been considered in formulating the price of its privatisation as they were not included in the documentation made available for consultation by the bidders.

On 24 May 2014, the Court denied the Navigator Group’s proposal to present testimony evidence, alternatively proposing written submissions. On 30 June 2014, the Group appealed against this decision but continuously presented written evidence. The Court ruled in favour of the Group’s claims in this regard; experts were appointed by the parties; the expert report was issued in July 2017; and, following this, both The Navigator Company, S.A. and the Ministry of Finance requested that the appointed experts appear at the hearing to provide oral explanations regarding the expert report.

Following claims filed by Navigator on 11 September 2017 and 15 January 2019, the experts submitted redrafted Expert Reports on 27 December 2018 and 19 March 2019, respectively.

The trial hearing took place between May and June 2019, with the parties filing closing arguments in September 2019, awaiting the passing of sentence since the case was concluded before the judge on 5 July 2021.

11. Group structure

11.1. Companies included in the consolidation perimeter

11.1.1. Navigator Group subsidiaries

Company	Head Office	Share equity owned (%) 31/12/2025 Direct	Indirect	Total	31/12/2024 Total	Main activity
Parent Company:						
The Navigator Company, S.A.	Portugal	-	-	-	-	Sale of paper and pulp
Subsidiaries:						
Navigator Brands , S.A.	Portugal	100.0	-	100.0	100.0	Acquisition, operation, lease or concession of the use and disposal of trademarks, patents and other industrial or intellectual property
Navigator Parques Industriais, S.A.	Portugal	100.0	-	100.0	100.0	Management of industrial real estate
Navigator Paper Figueira, S.A	Portugal	100.0	-	100.0	100.0	Paper production
Empremédia - Corretores de Seguros, S.A.	Portugal	100.0	-	100.0	100.0	Insurance mediation and advisory services
Empremedia, DAC	Ireland	100.0	-	100.0	100.0	Management of shareholdings
Empremedia RE, DAC	Ireland	-	100.0	100.0	100.0	Insurance mediation and advisory services
Raiz - Instituto de Investigação da Floresta e Papel	Portugal	97.0	-	97.0	97.0	Applied research in the field of pulp and paper industry and forestry activity
Enerpulp – Cogeração Energética de Pasta, S.A.	Portugal	100.0	-	100.0	100.0	Energy production
Navigator Pulp Figueira, S.A.	Portugal	100.0	-	100.0	100.0	Production of cellulose pulp and provision of administration, management and internal advisory services
Ema Cacia - Engenharia e Manutenção Industrial, ACE	Portugal	-	73.4	73.4	73.8	Provision of industrial maintenance services
Ema Setúbal - Engenharia e Manutenção Industrial, ACE	Portugal	-	80.0	80.0	80.7	
Ema Figueira da Foz- Engenharia e Manutenção Industrial, ACE	Portugal	-	70.1	70.1	79.7	
Navigator Pulp Setúbal, S.A.	Portugal	100.0	-	100.0	100.0	Cellulose pulp production
Navigator Pulp Aveiro, S.A.	Portugal	100.0	-	100.0	100.0	Cellulose pulp production
Navigator Fiber Solutions , S.A.	Portugal	-	100.0	100.0	100.0	Wholesale and manufacture of packaging and other items made from cellulose pulp, paper and cardboard and related products
Navigator Tissue Aveiro, S.A.	Portugal	100.0	-	100.0	100.0	Tissue paper production
Navigator Tissue Ródão, S.A.	Portugal	-	100.0	100.0	100.0	
Navigator Tissue Iberica, S.A.	Spain	-	-	-	100.0	Sale of tissue paper
Navigator Tissue Ejea , SL	Spain	100.0	-	100.0	100.0	Tissue paper production
Navigator Tissue France, EURL	France	-	100.0	100.0	100.0	Sale of tissue paper
Portucel Moçambique - Sociedade de Desenvolvimento Florestal e Industrial, Lda	Mozambique	90.0	-	90.0	90.0	Forestry production
Navigator Forest Portugal, S.A.	Portugal	-	-	-	100.0	Forestry production
Navigator Forest Portugal, S.A. (formerly EucaliptusLand, S.A.)	Portugal	100.0	-	100.0	100.0	Forestry production
Gavião - Sociedade de Caça e Turismo, S.A.	Portugal	-	100.0	100.0	100.0	Management of hunting resources
Afocelca - Agrupamento complementar de empresas para protecção contra incêndios, ACE	Portugal	-	64.8	64.8	64.8	Provision of forest fire prevention and fighting services
Viveiros Aliança - Empresa Produtora de Plantas, S.A.	Portugal	-	100.0	100.0	100.0	Plant production in nurseries
Greenbloom, A.C.E.	Portugal		66.7	66.7	-	Forestry and other forestry activities
Bosques do Atlantico, SL	Spain	-	100.0	100.0	100.0	Trade in wood and biomass and logging
Navigator Africa, SRL	Italy	-	100.0	100.0	100.0	Trade in wood and biomass and logging
Navigator Paper Setúbal , S.A.	Portugal	100.0	-	100.0	100.0	Paper and energy production
Navigator North America Inc.	USA	-	100.0	100.0	100.0	Sale of paper
Navigator Afrique du Nord	Morocco	-	100.0	100.0	100.0	Provision of sales intermediation services
Navigator España, S.A.	Spain	-	100.0	100.0	100.0	
Navigator Netherlands, BV	The Netherlands	-	100.0	100.0	100.0	
Navigator France, EURL	France	-	100.0	100.0	100.0	
Navigator Paper Company UK, Ltd	United Kingdom	-	100.0	100.0	100.0	
Navigator Holding Tissue UK, Ltd (formerly Accrol Group Holdings plc)	United Kingdom	-	100.0	100.0	100.0	Holding company
Navigator Corporate UK, ltd (formerly Accrol UK, ltd)	United Kingdom	-	100.0	100.0	100.0	Holding company
Accrol Holdings, ltd	United Kingdom	-	-	-	100.0	Holding company
Navigator Tissue UK, ltd (formerly Accrol Papers, ltd)	United Kingdom	-	100.0	100.0	100.0	Tissue paper conversion
LTC Parent Ltd	United Kingdom	-	100.0	100.0	100.0	Holding company
Leicester Tissue Company ltd	United Kingdom	-	100.0	100.0	100.0	Tissue paper conversion
Art Tissue ltd	United Kingdom	-	-	-	100.0	Sale of tissue paper
John Dale (Holdings) ltd	United Kingdom	-	100.0	100.0	100.0	Holding company
John Dale, ltd	United Kingdom	-	100.0	100.0	100.0	Tissue paper production
Severn Delta, ltd	United Kingdom	-	100.0	100.0	100.0	Tissue paper production
Navigator Italia, SRL	Italy	-	100.0	100.0	100.0	Provision of sales intermediation services
Navigator Deutschland, GmbH	Germany	-	100.0	100.0	100.0	
Navigator Paper Austria, GmbH	Austria	-	100.0	100.0	100.0	
Navigator Paper Poland SP Z o o	Poland	-	100.0	100.0	100.0	
Navigator Eurasia	Turkey	-	100.0	100.0	100.0	
Navigator Paper Mexico	Mexico	25.0	75.0	100.0	100.0	
Navigator Middle East Trading DMCC	Dubai	-	100.0	100.0	100.0	
Navigator Egypt, ELLC	Egypt	1.0	99.0	100.0	100.0	
Navigator Paper Southern Africa	South Africa	1.0	99.0	100.0	100.0	
Portucel Nigeria Limited	Nigeria	1.0	99.0	100.0	100.0	
Navigator Green Fuels Setúbal, S.A.	Portugal	100.0	-	100.0	100.0	Production of sustainable fuels
Navigator Green Fuels Figueira da Foz, S.A.	Portugal	100.0	-	100.0	100.0	Production of sustainable fuels
Navigator Abastecimento de Madeira, ACE	Portugal	97.0	3.0	100.0	100.0	Sale of wood

11.1.2. Incorporated joint operations

Company	Head Office	Share equity owned (%) 31/12/2025 Direct	Indirect	Total	31/12/2024 Total	Main activity
Pulpchem Logistics, A.C.E.	Portugal	50.0	-	50.0	50.0	Purchases of materials, subsidiary materials and services used in the pulp and paper production processes

11.2. Changes in the consolidation perimeter

During the period ended 31 December 2025, the following changes occurred in the consolidation perimeter:

2025
- Liquidation of Art Tissue ltd
- Incorporation of Navigator Company S.A. – Sucursal en España
- Incorporation of Greenbloom, A.C.E.
- Liquidation of Accrol Holdings, ltd
- Merger by incorporation of Navigator Tissue Iberica, S.A. into The Navigator Company S.A. – Sucursal en España
- Merger by incorporation of Navigator Forest Portugal, S.A. into EucaliptusLand, S.A. (renamed Navigator Forest Portugal, S.A.)

2024
- Acquisition of Navigator Holding Tissue UK, Ltd (formerly Accrol Group Holdings plc)
- Acquisition of Navigator Corporate UK, ltd (formerly Accrol uk, ltd)
- Acquisition of Accrol Holdings, ltd
- Acquisition of Navigator Tissue UK, ltd (formerly Accrol Papers, ltd)
- Acquisition of LTC Parent Ltd
- Acquisition of Leicester Tissue Company ltd
- Acquisition of Art Tissue ltd
- Acquisition of John Dale (Holdings)ltd
- Acquisition of John Dale, ltd
- Acquisition of Severn Delta, ltd

11.3. Transactions with related parties

Balances with related parties

Amounts in Euros	2025 Receivables (Note 4.2)	2025 Payables (Note 4.3)	2024 Receivables (Note 4.2)	2024 Payables (Note 4.3)
Shareholders (Note 5.2)				
Semapa - Soc. de Investimento e Gestão, SGPS, S.A.	18,491	2,225,972	-	1,155,456
Other subsidiaries of Semapa Group				
Secil - Companhia Geral Cal e Cimento, S.A.	-	14,213	-	18,970
Secil Agregados, S.A.	-	192,667	-	84,277
Secil Betão, S.A.	-	339,680	-	237,150
Other related parties				
Hotel Ritz, S.A.	-	-	-	844
	18,491	**2,772,532**	**-**	**1,496,697**

Transactions with related parties in the period

Amounts in Euros	2025		2024		
	Purchase of goods and services	Sales and services rendered	Purchase of goods and services	Sales and services rendered	Financial (expenses)/ income
Shareholders (Note 5.2)					
Semapa - Soc. de Investimento e Gestão, SGPS, S.A.	13,586,702	-	11,523,914	42	-
	13,586,702	**-**	**11,523,914**	**42**	**-**
Other subsidiaries of Semapa Group					
Secil - Companhia Geral Cal e Cimento, S.A.	17,576		116,562	-	-
Secil Agregados, S.A.	118,546	-	206,858	-	-
Secil Betão, S.A.	1,250,072	-	1,232,938	-	-
Triangles – Cycling Eqyipments, S.A.	44,639	-	-	-	-
	1,430,833	**-**	**1,556,358**	**-**	**-**
Other related parties					
Hotel Ritz, S.A.	9,423	-	14,916	-	1,106
	9,423	**-**	**14,916**	**-**	**1,106**
	15,026,958	**-**	**13,095,188**	**42**	**1,106**

On 1 February 2013, a services agreement was entered into between Semapa – Sociedade de Investimentos e Gestão, SGPS, S.A., currently holding 70.03% of the Group's share capital, and the Navigator Group, relating to the provision of management and administrative services. This agreement establishes a remuneration framework based on fair criteria for the parties within the context of the ongoing collaboration and assistance relationships, in compliance with the rules applicable to commercial relations between companies within the same Group. Transactions with the Secil Group are carried out under normal market conditions.

For the purposes of identifying related parties in financial reporting, the members of the Board of Directors and other Corporate Bodies were assessed and considered as related parties.

The remuneration of the Group's key management personnel is detailed in Note 7.3 – Remuneration of corporate bodies.

12. Note added for translation

The accompanying financial statements are a translation of financial statements originally issued in Portuguese. In the event of any discrepancies the Portuguese version prevails.

BOARD OF DIRECTORS

Ricardo Miguel dos Santos Pacheco Pires
Board of Directors Chairman

António José Pereira Redondo
Chairman of the Executive Board

José Fernando Morais Carreira de Araújo
Executive Board Member

Nuno Miguel Moreira de Araújo Santos
Executive Board Member

João Paulo Cabete Gonçalves Lé
Executive Board Member

Dorival Martins de Almeida
Executive Board Member

António Quirino Vaz Duarte Soares
Executive Board Member

Ana Teresa Cunha de Pinto Tavares Lehmann
Member

Hugo Alexandre Lopes Pinto
Member

Maria Isabel da Silva Marques Abranches Viegas
Member

Maria Teresa Aliu Presas
Member

Mariana Rita Antunes Marques dos Santos
Member

Vítor Paulo Paranhos Ferreira
Member

ANNUAL REPORT 2025

Statutory Auditors' Report and Auditors' Report

STATUTORY AUDITORS' REPORT and AUDITORS' REPORT

REPORT ON THE AUDIT OF THE CONSOLIDATED FINANCIAL STATEMENTS

Opinion

We have audited the accompanying consolidated financial statements of **The Navigator Company, S.A.** (the Group), which comprise the consolidated statement of financial position as at 31 December 2025 (showing a total of Euro 3,188,523,352 and total equity of Euro 1,413,128.875, including a profit for the year attributable to shareholders of Euro 144,667,435), and the consolidated income statement, consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and the accompanying notes to the consolidated financial statements, including a summary of accounting policies.

In our opinion, the accompanying consolidated financial statements give a true and fair view, in all material respects, of the consolidated financial position of **The Navigator Company, S.A.** as at 31 December 2025 and of its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with the International Financial Reporting Standards (IFRS) as adopted by the European Union .

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) and further technical and ethical standards and guidelines as issued by *Ordem dos Revisores Oficiais de Contas* (the Portuguese Institute of Statutory Auditors). Our responsibilities under those standards are further described in the "Auditors' Responsibilities for the Audit of the Consolidated Financial Statements" section below. We are independent of the entities that comprise the Group in accordance with the law and we have fulfilled other ethical requirements in accordance with the *Ordem dos Revisores Oficiais de Contas*' code of ethics.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the consolidated financial statements of the current year. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Recoverability of Goodwill (Euro 420,580,669), Intangible assets (Euro 107,637,839) and Property, Plant and Equipment (Euro 1,462,499,503)

See Note 1.5 Significant accounting estimates and judgements and Notes 3.1, 3.2 and 3.3 of the notes to the Financial Statements

The Risk	Our response to the identified risk
The recoverability of Goodwill, Intangible assets and Property, plant and equipment is critical due to the materiality of the amounts involved and the complexity and subjectivity associated with impairment tests, namely due to the uncertainty inherent in financial projections, which are based on the Board of Directors' expectations, materialised in business and investment plans, which are based on various assumptions associated with discount rates, expected margins, short- and long-term growth rates, and demand behaviour, decarbonisation initiatives in response to changes in laws and regulations, and assumptions not observable in the market.	Our audit procedures included, amongst others, those that we describe below: • We assessed the design and implementation of the main controls implemented by the Group related to this matter and analysed the budgeting procedures on which the projections are based, by comparing the current performance with estimates made in previous periods, and the integrity of the discounted cash flow model; • We assessed the internal and external assumptions used and their reasonableness, such as current business trends, market performance, inflation, projected economic growth and discount rates; • We conducted sensitivity analyses on the significant assumptions used by the Group; • We involved our specialists in assessing the average cost of capital; and, • We assessed the adequacy of the relevant disclosures in the financial statements, in accordance with the applicable accounting framework.

Fair value of biological assets (Euro 120,646,643)

See Note 1.5 Significant accounting estimates and judgements and Note 3.8 of the notes to the Financial Statements.

The Risk	Our response to the identified risk
The fair value of biological assets is determined using an internally developed model, based on economic and market projections, the assumptions of which, namely the forest productivity, the selling price of wood less logging costs, the rental value of owned and leased land, collection and transport costs, the planting and maintenance costs, and the discount rate, require a high degree of estimation and judgement on the part of the Board of Directors.	Our audit procedures included, amongst others, those that we describe below: • We assessed the design and implementation of the main controls implemented by the Group in this area; • We validated the mathematical accuracy and underlying integrity of the model; • We analysed the budgeting procedures on which projections are based; • We compared the actual performance of variables underlying the model with estimates performed in prior periods, namely: forest productivity, the rental value of owned and leased land, fixed costs, logging and transport costs, and planting and maintenance costs; • We compared the internal and external assumptions used in the model, such as spot and trend prices and the discount rate, with market data and assessed their sensitivity; and, • We assessed the adequacy of the relevant disclosures in the financial statements, in accordance with the applicable accounting framework.

Uncertainty over income tax treatments

See Note 1.5 Significant accounting estimates and judgements and Notes 6.1 and 6.2 of the notes to the Financial Statements

The Risk	Our response to the identified risk
The application of tax legislation to the various transactions and circumstances with uncertain tax treatment is inherently complex and requires judgement in determining and measuring the risks and uncertainties in determining the best estimate, by weighing up all possible outcomes within the Group's control and their associated probabilities. Estimating potential amounts to be spent requires a high degree of judgement on the part of the Board of Directors, which assesses the probability of the outcome, supported by the opinion of legal and tax advisors.	Our audit procedures included, amongst others, those that we describe below: • We assessed the processes for monitoring uncertain tax positions in relation to the treatment of income tax, including testing the design and implementation of the main controls in place and making enquiries of the Board of Directors and tax managers on the basis of their estimates and judgements; • We analysed ongoing tax proceedings and potential uncertain tax positions, considering the effect of uncertainty for each uncertain tax treatment related to income tax, with the support of tax specialists and review of existing documentation; • We analysed the responses to the confirmation requests received from external lawyers; • We assessed the consistency of the criteria followed in the previous years; and, • We assessed the adequacy of the relevant disclosures in the financial statements, in accordance with the applicable accounting framework.

Responsibilities of management and the supervisory body for the consolidated financial statements

Management is responsible for:

- the preparation of consolidated financial statements that give a true and fair view of the Group's consolidated financial position, financial performance and the consolidated cash flows, in accordance with the International Financial Reporting Standards (IFRS) as adopted by the European Union;
- the preparation of the consolidated management report, the corporate governance report, the consolidated non-financial information and the remunerations' report in accordance with applicable laws and regulations;
- designing and maintaining an appropriate internal control system to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error;
- the adoption of accounting policies and principles appropriate in the circumstances; and,
- assessing the Group's ability to continue as a going concern, and disclosing, as applicable, the matters that may cast significant doubt about the Group's ability to continue as a going concern.

The supervisory body is responsible for overseeing the Group's financial reporting process.

Auditors' Responsibilities for the Audit of the Consolidated Financial Statements

Our responsibility is to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatements whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISA, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation;
- plan and perform our audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or units within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit and are ultimately responsible for our audit opinion;
- communicate with those charged with governance, including the supervisory body, regarding, among other matters, the planned scope and timing of the audit, and significant audit findings including any significant deficiencies in internal control that we identify during our audit;
- determine, from the matters communicated with those charged with governance, including the supervisory body, those matters that were of most significance in the audit of the consolidated financial statements of the current year and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes their public disclosure; and,
- provide the supervisory body with a statement that we have complied with the relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

Our responsibility also includes the verification that the information contained in the consolidated management report is consistent with the consolidated financial statements, and the verification of the requirements as provided in numbers 4 and 5 of article 451 of the Portuguese Companies' Code regarding the corporate governance report, as well as the verification that the consolidated non-financial information and the remunerations report were presented.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

On the consolidated management report

Pursuant to Article 451, nr. 3, al.(e) of the Portuguese Companies' Code, it is our opinion that the consolidated management report was prepared in accordance with the applicable legal and regulatory requirements and the information contained therein is consistent with the audited consolidated financial statements and, having regard to our knowledge and assessment of the Group, we have not identified any material misstatements. As defined in Article 451, nr. 7 of the Portuguese Companies' Code, this opinion is not applicable to the consolidated non-financial statement that is included in the consolidated management report.

On the Corporate Governance Report

Pursuant to Article 451, nr. 4 of the Portuguese Companies' Code, it is our opinion that the corporate governance report includes the information required to the Group to provide under Article 29-H of the Securities Code, and we have not identified any material misstatements on the information provided therein in compliance with paragraphs c), d), f), h), i) and l) of nr. 1 of that Article.

On the consolidated non-financial information

Pursuant to Article 451, nr. 6 of the Portuguese Companies' Code, we inform that the Group has prepared a separate report which includes the consolidated non-financial information as provided for in Article 508-G of the Portuguese Companies' Code.

On the remunerations' report

Pursuant to Article 26-G, nr. 6, of the Securities Code, we inform that the Group has included in the corporate governance report, in a separate chapter, the information provided in nr. 2 of that Article.

On the European single electronic format (ESEF)

The consolidated financial statements of The Navigator Company, S.A. for the year ended 31 December 2025 must comply with the applicable requirements established by the Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 (ESEF Regulation).

Management is responsible for the preparation and presentation of the annual report in accordance with the ESEF Regulation.

Our responsibility is to obtain reasonable assurance about whether the consolidated financial statements, included in the annual report, have been prepared in accordance with the requirements of the ESEF Regulation.

Our procedures considered the OROC (Portuguese Institute of Statutory Auditors) Technical Application Guide on ESEF reporting and included, amongst others:

- obtaining an understanding of the financial reporting process, including the presentation of the annual report in a valid XHTML format; and,
- identifying and assessing the risks of material misstatement related to the tagging of information in the financial statements, in XBRL format using iXBRL technology. This assessment was based on an understanding of the information tagging process implemented by the Entity.

In our opinion, the consolidated financial statements included in the annual report, are presented, in all material respects, in accordance with the requirements established by the ESEF Regulation.

On the additional matters provided in Article 10 of the Regulation (EU) 537/2014

Pursuant to Article 10 of the Regulation (EU) 537/2014 of the European Parliament and of the Council, of 16 April 2014, and in addition to the key audit matters mentioned above, we also report the following:

- We were first appointed as auditors of the Group in the General Shareholders Meeting held on 22 September 2017 for the last mandate from 2015 to 2018. We were reappointed as auditors in the General Shareholders Meeting held on 9 April 2019 for a second mandate from 2019 to 2022, and on 17 May 2023 for a third mandate from 2023 to 2025. In the General Shareholders Meeting held on 29 May 2025, which decided to amend the term of the current mandate, we were appointed to a fourth mandate from 2025 to 2027.
- Management as confirmed to us that they are not aware of any fraud or suspicion of fraud having occurred that has a material effect on the financial statements. In planning and executing our audit in accordance with ISAs we maintained professional scepticism, and we designed audit procedures to respond to the possibility of material misstatement in the consolidated financial statements due to fraud. As a result of our work, we have not identified any material misstatement of the consolidated financial statements due to fraud.
- We confirm that the audit opinion we issue is consistent with the additional report that we prepared and delivered to the supervisory body of the Group on 10 April 2026.
- We declare that we have not provided any prohibited services as described in under Article 5 of Regulation (EU) 537/2014 of the European Parliament and of the Council, of 16 April 2014, and we have remained independent of the Group in conducting the audit.

10 April 2026

SIGNED ON THE ORIGINAL

KPMG & Associados -
Sociedade de Revisores Oficiais de Contas, S.A.
(ROC no. 189 and registered at CMVM with no. 20161489)
Represented by
Rui Filipe Dias Lopes
(ROC no. 1715 and registered at CMVM with no. 20161325)

ANNUAL REPORT 2025

Report and Opinion of the Audit Board

(TRANSLATION OF A REPORT ORIGINALLY ISSUED IN PORTUGUESE; IN CASE OF DISCREPANCIES THE PORTUGUESE VERSION PREVAILS)

The Navigator Company, S.A.

Report and Opinion of the Audit Board
Consolidated Financial Statements

2025 Financial Year

To the Shareholders,

1. In accordance with the Law, the Articles of Association of the Company and under the terms of the mandate conferred upon us, we hereby submit the report on our supervisory activities carried out in 2025 and issue our opinion on the Management Report (included in the Annual Report) and on the Consolidated Financial Statements presented by the Board of Directors of the Navigator Company, S.A. (*Company*), for the year ended 31 December 2025.

2. Over the course of the year we regularly monitored the activities of the Company and its most significant affiliates and associates, as often and as extensively as we deemed appropriate, through regular meetings with the Company's Directors and Managers. We monitored the verification of the accounting records and respective supporting documentation, as well as the effectiveness of the risk management, internal control and the internal audit systems. We monitored compliance with the Law and the Articles of Association. In the course of our activities, we encountered no constraints whatsoever.

3. We have met several times with KPMG & Associados, SROC,S.A., in their capacity as Statutory Auditors and External Auditors, monitoring the audit work carried out and checking their independence. We have analysed the Statutory Auditors' Report and Auditors' Report, dated April 10th2026, which does not include any qualification or emphasis and with which we agree.

4. We also monitored the Navigator Group's sustainability reporting process. It should be noted in this regard that the non-financial statement prepared in accordance with the requirements of the European Sustainability

Reporting Standards (ESRS), contains relevant information that enables an understanding of the performance, position and impact of the Group's activities and businesses, concerning environmental, social and governance issues.

5. We have also acknowledged the Limited Assurance Independent Auditors' Report on the Sustainability Report, dated April 10th 2026,for the purpose of issuing a limited assurance conclusion, which has not been modified.

6. The Audit Board analysed the proposals submitted to it for the provision of non-audit services by the Statutory Auditors and approved those that concerned permitted services, did not affect the independence of the Statutory Auditors and complied with the other legal requirements.

7. Within the scope of our duties, we have verified that:

   a) The Consolidated Income Statement, the Consolidated Statement of Financial Position, the Consolidated Statement of Comprehensive Income, the Consolidated Statement of Changes in Equity, the Consolidated Statement of Cash Flows and the accompanying Notes to the Consolidated Financial Statements, provide an adequate understanding of the Company's financial position and results, comprehensive income, changes in equity, and cash flows;

   b) The accounting policies and valuation criteria adopted comply with the International Financial Reporting Standards (IFRS) as adopted in the European Union and are suitable to ensure that such criteria lead to a correct valuation of the Company's assets and results;

   c) The Management Report is sufficiently clear in explaining the business development and the situation of the Company and all subsidiaries included in the consolidation, clearly highlighting the most significant aspects of the activity;

   d) The Corporate Governance Report includes the information required by Article 29.º-H of the Portuguese Securities Code and has taken into account the recommendations of the Code of the Portuguese Institute for Corporate Governance (IPCG).

8. Accordingly, taking into consideration the information received from the Board of Directors and the Company departments, the conclusions of the Statutory Auditor's Report and Auditor's Report, and the conclusions of the Limited Assurance Independent Auditor's Report on the Sustainability Report, we recommend that:

   a) The Management Report be approved;

   b) The Consolidated Financial Statements be approved.

9. Finally, the members of the Audit Board wish to thank the Board of Directors, managers and other staff of the Company, as well as the Statutory Auditors KPMG & Associados, SROC,S.A for their collaboration and support in carrying out our work.

Lisbon, 10th April, 2026

The Chair of the Audit Board

Maria da Luz Gonçalves de Andrade Campos

Member

José Manuel Oliveira Vitorino

Member

Jorge Manuel Araújo de Beja Neves

ANNUAL REPORT 2025

Separate Financial Statements

Separate Income Statement

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
Revenue	2.1	2,624,957,692	2,834,653,080
Other operating income	2.2	4,633,013	4,038,014
Cost of goods sold and materials consumed	4.1	(2,279,508,173)	(2,476,330,691)
External services and supplies	2.3	(262,003,100)	(233,629,116)
Payroll costs	7.1	(10,249,496)	(5,593,834)
Other operating expenses	2.3	(3,534,974)	(2,659,370)
Net provisions	9.1	(180,561)	(23,630)
Gains/(losses) of subsidiaries	10.1	101,902,205	192,493,281
Depreciation, amortisation and impairment losses on non-financial assets	3.3	(709,086)	(626,617)
Operating profit/ (loss)		**175,307,520**	**312,321,117**
Financial income and gains	5.10	34,363,812	44,956,205
Financial expenses and losses	5.10	(48,013,715)	(58,417,463)
Profit before income tax		**161,657,617**	**298,859,859**
Income tax	6.1	(16,990,182)	(11,911,664)
Net profit for the period		**144,667,435**	**286,948,195**
Earnings per share			
Basic earnings per share, Eur	5.3	0.203	0.403
Diluted earnings per share, Eur	5.3	0.203	0.403

The accompanying notes form an integral part of these separate financial statements.

Setúbal, 20 March 2026

Separate statement of comprehensive income

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
Net profit for the period		**144,667,435**	**286,948,195**
Items that may be reclassified to the income statement			
Hedging derivative financial instruments			
Changes in fair value	8.2	(15,935,709)	(1,526,544)
Tax effect	6.2	4,227,027	639,231
Other changes in the equity of subsidiaries	10.1	(672,584)	9,086,118
Items that may not be reclassified to the income statement			
Remeasurement of post-employment benefits	7.2	(61,496)	(214,318)
Other comprehensive income		-	-
Total other comprehensive income net of taxes		**(12,442,762)**	**7,984,487**
Total comprehensive income		**132,224,673**	**294,932,682**

The accompanying notes form an integral part of these separate financial statements.

Setúbal, 20 March 2026

Separate statement of financial position

As at 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
ASSETS			
Non-current assets			
Property, plant and equipment	3.1	1,014,269	1,153,588
Right-of-use assets	3.2	815,882	1,359,258
Investments in subsidiaries	10.1	1,611,032,383	1,778,826,227
Investments in associates		44,600	44,600
Non-current receivables	4.2	6,684	6,684
Deferred tax assets	6.2	2,388,132	8,614,912
		1,615,301,950	**1,790,005,269**
Current assets			
Inventories	4.1	15,771,481	27,283,541
Current receivables	4.2	968,978,969	1,034,094,913
Income tax	6.1	28,524,371	19,746,025
Cash and cash equivalents	5.8	456,494,930	406,735,567
		1,469,769,751	**1,487,860,046**
Total Assets		**3,085,071,701**	**3,277,865,315**
EQUITY AND LIABILITIES			
Capital and reserves			
Share capital	5.2	500,000,000	500,000,000
Reserves by applying the equity method	5.5	(395,801,293)	(395,128,709)
Fair value reserve	5.5	302,772	12,011,454
Legal reserve	5.5	100,000,000	100,000,000
Other reserves	5.5	(8,558,326)	(8,338,101)
Retained earnings	5.5	1,072,128,442	960,235,449
Net profit for the period		144,667,435	286,948,195
Early dividends	5.4	-	(99,999,451)
Total Equity		**1,412,739,030**	**1,355,728,837**
Non-current liabilities			
Interest-bearing liabilities	5.6	752,492,867	707,608,727
Lease liabilities	5.7	259,283	876,698
Pensions and other post-employment benefits	7.2	568,270	408,936
Deferred tax liabilities	6.2	319,807	4,728,162
Provisions	9.1	16,548,916	16,624,744
		770,189,143	**730,247,267**
Current liabilities			
Interest-bearing liabilities	5.6	211,217,978	365,423,477
Lease liabilities	5.7	626,670	587,065
Current payables	4.3	683,926,618	789,671,835
Income tax	6.1	6,372,262	36,206,834
		902,143,528	**1,191,889,211**
Total Liabilities		**1,672,332,671**	**1,922,136,478**
Total Equity and Liabilities		**3,085,071,701**	**3,277,865,315**

The accompanying notes form an integral part of these separate financial statements.

Setúbal, 20 March 2026

Statement of Changes in Equity

For the periods ended 31 December 2025 and 2024

2025

Amounts in Euros	Note	Share capital	Reserves by applying the equity method	Fair value reserve	Legal reserve	Other reserves	Retained earnings	Net profit for the period	Early dividends	Total
Equity as at 1 January 2025		**500,000,000**	**(395,128,709)**	**12,011,454**	**100,000,000**	**(8,338,101)**	**960,235,449**	**286,948,195**	**(99,999,451)**	**1,355,728,837**
Net profit for the period		-	-	-	-	-	-	144,667,435	-	144,667,435
Other comprehensive income (net of taxes)		-	(672,584)	(11,708,682)	-	-	(61,496)	-	-	(12,442,762)
Total comprehensive income for the period		**-**	**(672,584)**	**(11,708,682)**	**-**	**-**	**(61,496)**	**144,667,435**	**-**	**132,224,673**
Appropriation of 2024 net profit for the period:										
- Dividends paid	5.4	-	-	-	-	-	(74,994,255)	-	-	(74,994,255)
- Appropriation of prior period's net profit		-	-	-	-	-	305,948,195	(286,948,195)	-	19,000,000
- Bonus to employees		-	-	-	-	-	(19,000,000)	-	-	(19,000,000)
Acquisitions/Disposals of non-controlling interests		-	-	-	-	(220,225)	-	-	-	(220,225)
Early dividends	5.4	-	-	-	-	-	(99,999,451)	-	99,999,451	-
Total transactions with shareholders		**-**	**-**	**-**	**-**	**(220,225)**	**111,954,489**	**(286,948,195)**	**99,999,451**	**(75,214,480)**
Equity as at 31 December 2025		**500,000,000**	**(395,801,293)**	**302,772**	**100,000,000**	**(8,558,326)**	**1,072,128,442**	**144,667,435**	**-**	**1,412,739,030**

2024

Amounts in Euros	Note	Share capital	Reserves by applying the equity method	Fair value reserve	Legal reserve	Other reserves	Retained earnings	Net profit for the period	Early dividends	Total
Equity as at 1 January 2024		**500,000,000**	**(404,214,827)**	**12,898,767**	**100,000,000**	**1,103,749**	**830,534,306**	**274,923,820**	**-**	**1,315,245,815**
Net profit for the period		-	-	-	-	-	-	286,948,195	-	286,948,195
Other comprehensive income (net of taxes)		-	9,086,118	(887,313)	-	-	(214,318)	-	-	7,984,487
Total comprehensive income for the period		**-**	**9,086,118**	**(887,313)**	**-**	**-**	**(214,318)**	**286,948,195**	**-**	**294,932,682**
Appropriation of 2023 net profit for the period:										
- Dividends paid	5.4	-	-	-	-	-	(149,995,621)	-	-	(149,995,621)
- Appropriation of prior period's net profit		-	-	-	-	-	288,923,820	(274,923,820)	-	14,000,000
- Bonus to employees		-	-	-	-	-	(14,000,000)	-	-	(14,000,000)
Acquisitions/Disposals of non-controlling interests		-	-	-	-	(9,441,850)	4,987,262	-	-	(4,454,588)
Early dividends	5.4	-	-	-	-	-	-	-	(99,999,451)	(99,999,451)
Total transactions with shareholders		**-**	**-**	**-**	**-**	**(9,441,850)**	**129,915,461**	**(274,923,820)**	**(99,999,451)**	**(254,449,660)**
Equity as at 31 December 2024		**500,000,000**	**(395,128,709)**	**12,011,454**	**100,000,000**	**(8,338,101)**	**960,235,449**	**286,948,195**	**(99,999,451)**	**1,355,728,837**

The accompanying notes form an integral part of these separate financial statements.

Setúbal, 20 March 2026

Separate Statement of Cash Flows

For the periods ended 31 December 2025 and 2024

Amounts in Euros	Note	2025	2024
OPERATING ACTIVITIES			
Receipts from customers		2,969,892,061	3,026,047,297
Payments to suppliers		(3,124,849,771)	(3,205,640,926)
Payments to employees		(8,039,586)	(4,519,061)
Cash flows from operations		(162,997,296)	(184,112,690)
Income tax received/ (paid)		(7,190,907)	(4,470,593)
Other receipts/ (payments) relating to operating activities		275,384,509	248,443,069
Cash flows from operating activities (1)		**105,196,306**	**59,859,786**
INVESTING ACTIVITIES			
Inflows:			
Property, plant and equipment			-
Loans to subsidiaries		198,614,863	26,134,044
Interest and similar income		25,342,374	28,679,894
Investments in subsidiaries		-	50
Dividends from subsidiaries		259,089,914	246,013,925
		483,047,151	**300,827,913**
Outflows:			
Investments in subsidiaries		(2,500,000)	(29,101,294)
Loans to subsidiaries		(192,435,682)	(198,614,863)
Property, plant and equipment		-	-
		(194,935,682)	**(227,716,157)**
Cash flows from investing activities (2)		**288,111,469**	**73,111,756**
FINANCING ACTIVITIES			
Inflows:			
Interest-bearing liabilities	5.9	390,000,000	330,000,000
		390,000,000	**330,000,000**
Outflows:			
Interest-bearing liabilities	5.9	(444,920,636)	(103,039,683)
Amortisation of lease agreements	5.7	(639,281)	(614,255)
Interest and similar expense		(38,521,881)	(41,041,598)
Distribution of dividends	5.4	(174,993,706)	(149,995,621)
Loans from subsidiaries		(20,190,609)	(21,600,000)
		(679,266,113)	**(316,291,157)**
Cash flows from financing activities (3)		**(289,266,113)**	**13,708,843**
CHANGES IN CASH AND CASH EQUIVALENTS (1)+(2)+(3)		**104,041,662**	**146,680,385**
Effect of exchange rate differences		(76,800)	34,769
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE PERIOD	5.8	**188,732,725**	**42,017,571**
CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD	5.8	**292,697,587**	**188,732,725**

The accompanying notes form an integral part of these separate financial statements.

Setúbal, 20 March 2026

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1. Introduction

The following symbols are used in the presentation of the Notes to the financial statements:

Accounting policies

This symbol indicates the disclosure of accounting policies specifically applicable to the items in the respective Note.

Significant Estimates and Judgements

This symbol indicates the disclosure of the estimates and/or judgements made regarding the items in the respective Note. Significant estimates and judgements are indicated in Note 1.5.

References

This symbol indicates a reference to another Note or another section of the Financial Statements were more information about the items disclosed is presented.

1.1. Disclosure

The Navigator Company, S.A. (Navigator or the Company) is a publicly traded company with its head office in Mitrena, 2901-861 Setúbal, and it is listed on NYSE Euronext Lisbon under the ISIN PTPTI0AM0006.

Company: The Navigator Company, S.A.

Head Office: Mitrena – Apartado 55 | 2901-861 Setúbal | Portugal

Legal Form: Public Limited Company

Share Capital: Euro 500,000,000

TIN: 503 025 798

Shares issued: 711,183,069

Navigator is the parent company of the Navigator Group (Group), comprising Navigator and Subsidiaries, as presented in the consolidated financial statements.

The Navigator Company, S.A. (until 2015 designated Portucel, S.A.), hereinafter referred to as Company or Navigator, is a publicly traded company with its share capital represented by nominal shares and was incorporated on 31 May 1993, under Decree- Law 39/93 of 13 February, as a result of the restructuring process of Portucel - Empresa de Celulose e Papel de Portugal, E.P.

The Group it currently leads was created in 1953, when a group of technicians from "Companhia Portuguesa de Celulose de Cacia" made this company the first in the world to produce bleached eucalyptus sulphate pulp.

In 1976, Portucel EP was created as a result of the nationalisation of the cellulose industry which, through the merger of CPC – Companhia de Celulose, S.A.R.L. (Cacia), Socel – Sociedade Industrial de Celulose, S.A.R.L. (Setúbal), Celtejo – Celulose do Tejo, S.A.R.L. (Vila Velha de Ródão), Celnorte – Celulose do Norte, S.A.R.L. (Viana do Castelo) and Celuloses do Guadiana, S.A.R.L. (Mourão) incorporated Portucel - Empresa de Celulose e Papel de Portugal, E.P., converted into a Public Limited Company of mainly public capital by Decree-Law 405/90, of 21 December.

Years after, as a result of the restructuring of Portucel – Empresa de Celulose e Papel de Portugal, S.A., which was renamed Portucel, SGPS, S.A., towards its privatisation, Portucel S.A. was created, on 31 May 1993, through Decree-law 39/93, of 13 February, with the former assets of the two main companies, based in Aveiro and Setúbal.

In 1995, the Company was again privatised and became a publicly traded company.

Aiming to restructure the paper industry in Portugal, Portucel acquired Papéis Inapa, S.A. (Setúbal), in 2000, and Soporcel – Sociedade Portuguesa de Papel, S.A. (Figueira da Foz), in 2001. These strategic moves were decisive and gave rise to the Portucel Soporcel Group (now The Navigator Group), which is currently the largest European producer of bleached eucalyptus pulp and one of the largest European producers of uncoated wood-free paper (UWF).

In June 2004, the Portuguese State sold 30% of Portucel's capital, which was acquired by the Semapa Group. In September of the same year, Semapa launched a public acquisition offer tending to secure the Group's control, which was accomplished by guaranteeing a 67.1% stake of Portucel's equity.

In November 2006, the Portuguese State concluded the third and final stage of the sale of Portucel, S.A., and Parpública, SGPS, S.A. sold the remaining 25.72% it still held, thus increasing the free-float.

In 2007, the Group invested in a new paper machine located at the Setúbal industrial site which started operating on a regular basis in October 2009.

From 2009 to July 2015, more than 75% of the Company's share capital was held, directly and indirectly, by Semapa – Sociedade de Investimento e Gestão SGPS, S.A. (excluding treasury shares) having the percentage of voting rights been reduced to around 70% following the conclusion of the offer for the acquisition, in the form of an exchange offer, of the ordinary shares of Semapa in July 2015. Since June 2024, this percentage has stood at 70.03%.

In February 2015, the Group started its activity in the Tissue segment with the acquisition of AMS-BR Star Paper, S.A. (currently denominated Navigator Tissue Ródão, S.A.), a Company that holds and explores a production unit, located in Vila Velha de Ródão. A new industrial facility was built in Aveiro, in August 2018, operated by Navigator Tissue Aveiro, S.A., and is currently the largest Portuguese producer.

Also, in 2015, the company sold the industrial assets used in the production of BEKP at the Setúbal Industrial Complex to its indirect subsidiary Navigator Pulp Setúbal, S.A., thus ceasing to have any industrial activity, as it had already sold the industrial assets used in the production to the current Navigator Paper Setúbal, S.A. in 2009.

On 6 February 2016, the Portucel Soporcel Group changed its corporate brand to The Navigator Company. This new corporate identity represents the union of companies with a history of more than 60 years, aiming to give the Group a more appealing and modern image.

Following this event, and after approval in the General Shareholder's Meeting, held on 19 April 2016, Portucel S.A. changed its designation to The Navigator Company, S.A.

Also, in 2016, the Company carried out a capital increase in kind in Enerpulp – Cogeração Energética da Pasta, S.A., through the delivery of the two biomass power generation plants located at the Setúbal and Aveiro industrial sites and also carried out a capital increase in kind in Navigator Parques Industriais, S.A. through the incorporation of the industrial land and buildings located in Aveiro and Setúbal.

On 1 January 2017, the Company started to concentrate its sales of paper, cellulose pulp and Tissue products, becoming the Group's product distributor. As a result, it quickly became one of the main national exporters, and certainly the one with the highest added value for the national economy.

In October 2017, it started to centralise supplies to the Group, with the Group's pulp producers starting to sell pulp exclusively to Navigator, which supplies the Group's paper producers, in addition to the sales to the market it had already been developing. As from January 2018, it strengthened this new activity, centralising its foreign purchases and the supply of most of the raw materials used in the production process.

Also, in 2017, Navigator started to prepare its separate financial statements in accordance with IFRS – International Financial Reporting Standards.

Thus, from 2017 onwards, and with reinforcement in 2018, the Company focused its activities on selling paper and related products, supplying industrial products, as well as providing administration and management services to its direct and indirect subsidiaries, and on managing its shareholdings. In addition, the company transfers personnel to other Group companies.

On 31 March 2023 the acquisition of the Gomà-Camps Group's consumer Tissue business in Spain was concluded, with a view to strengthening the Navigator Group's presence in this business segment. The integration of this new mill has elevated the Group to the position of second largest Iberian tissue producer, with a production and converting capacity of 180 thousand tonnes.

In May 2024, the Navigator Group acquired all the shares representing the share capital of Accrol Group Holdings plc (“Accrol”), a leader in the tissue paper converting segment in the United Kingdom, producing private label toilet rolls, kitchen rolls and facial tissues for most of the main UK retailers, bringing total converting capacity to 311,000 tonnes.

In 2026, the Navigator Group approved a strategic investment in the tissue segment, involving the installation of a new production machine at its industrial complex in Aveiro, thereby strengthening its industrial base in Portugal and the vertical integration of its operations, particularly in supplying its converting facility in the United Kingdom.

This project, scheduled to begin in 2028 with a total investment of approximately Euro 115 million, will improve operational efficiency, reduce reliance on external suppliers, and develop solutions better aligned with customer needs. It has been included in the Investment Contract Scheme under the Portugal 2030 initiative, in line with the Group’s strategy for sustainable growth and long-term value creation.

The Navigator Group’s main business is the production and sale of writing and printing uncoated woodfree paper (UWF) and domestic consumption paper (Tissue), as well as pulp, and it is present in the whole value-added chain, from research and development of forestry and agricultural production, to the purchase of wood and the production and sale of bleached eucalyptus kraft pulp – BEKP and electric and thermal energy, as well as its commercialisation.

A more detailed description of the activity in each business line of Navigator is disclosed in Note 2.1 – Revenue and segment reporting.

Navigator is included in the consolidation perimeter of Semapa – Sociedade de Investimento e Gestão, SGPS, S.A., the Parent Company, and Sodim – SGPS, S.A., the final controlling entity.

In turn, Filipa Mendes de Almeida de Queiroz Pereira, Mafalda Mendes de Almeida de Queiroz Pereira and Lua Mónica Mendes de Almeida de Queiroz Pereira hold joint control of Sodim - SGPS, S.A. (Sodim) through the combination of a shareholders' agreement. (Sodim) with their respective direct and indirect shareholdings in the share capital of this company, joint control of Sodim, Semapa and Navigator is attributable to each of them and to Sodim, under the terms of Article 20 of the Portuguese Securities Code, 83.221% of the non-suspended voting rights relating to shares representing the share capital of Semapa and also to each of them, Sodim and Semapa, 70.03% of the non-suspended voting rights relating to shares representing the share capital of Navigator.

1.2. Subsequent events

Storm Kristin

During the first quarter of 2026, Portugal was hit by a number of severe weather events, most notably Storm Kristin, which brought extreme weather conditions, including strong winds, heavy rainfall and flooding, with a significant impact on several regions, particularly the Central region.

These adverse conditions temporarily affected some of the Navigator Group’s forest areas and industrial operations at the Figueira da Foz and Vila Velha de Ródão facilities, mainly due to external disruptions to the electricity and water supplies.

No significant damage to stock or essential equipment was reported, and most risks are covered by current insurance policies.

Production resumed a few days later, as soon as essential supplies had been restored, whilst the Group’s other industrial facilities continued to operate as normal. Concurrently, the Group has been gradually recovering from the logistical constraints caused by the weather conditions, with operational and logistics teams having implemented measures to ensure a swift and sustained recovery, thereby ensuring compliance with trade commitments and the stability of operations.

US Supreme Court ruling on trade tariffs

Following court rulings rendered in the United States in February and March 2026, the US Supreme Court and the US Court of International Trade ruled that the trade tariffs imposed in 2025 under the International Emergency Economic Powers Act (IEEPA) were unlawful, ordering their cessation and the refund of amounts unduly charged to the affected importers.

As a result of these decisions, US customs authorities were instructed to recalculate the duties on the imports concerned and to refund the duties paid, including interest, in respect of eligible transactions.

Based on the information currently available and the analysis carried out, Navigator estimates that it may be refunded an amount of approximately Euro 4.3 million, plus interest, corresponding to charges previously incurred. As at the reporting date, the refund process is still ongoing, pending administrative processing by the US authorities; accordingly, there is no certainty at this stage as to the timing of receipt.

Navigator will continue to monitor the progress of the process and will recognise the related amounts in its accounts in accordance with the applicable standards once the necessary conditions have been met.

There were no events, other than those mentioned, that resulted in additional adjustments or disclosures in the Group's consolidated financial statements in the period ended 31 December 2025.

Conflict in the Middle East

Following the end of the reporting period, there was an escalation of the military conflict in the Middle East, resulting in significant disruptions to international trade and logistics routes, as well as increased volatility in energy markets, particularly oil and natural gas.

These events occurred after the reporting date and do not affect the circumstances as at 31 December 2025. At the date of approval of the financial statements, the Board of Directors had not identified any material direct effects on the Group's operations, financial position or performance. Nevertheless, developments in the situation may affect energy costs, supply chains and other operational factors in future periods.

The Board of Directors continues to monitor the international situation and will take whatever measures it deems appropriate to mitigate any potential adverse impacts.

1.3. Basis of preparation

1.3.1. Authorisation to issue financial statements

These separate financial statements were approved by the Board of Directors on 20 March 2026. However, they are still subject to approval by the General Shareholders Meeting, in accordance with the Portuguese commercial legislation.

The Company's senior management, which are the members of the Board of Directors who sign this report, declare that, to the best of their knowledge, the information contained herein was prepared in compliance with the applicable accounting standards, providing a true and fair view of the assets and liabilities, the financial position and results of the Company.

1.3.2. Accounting principles

The separate financial statements for the period ended 31 December 2025 were prepared in accordance with the International Financial Reporting Standards (IFRS), effective 1 January 2025 and as adopted by the European Union.

1.3.3. Presentation currency and transactions in a currency other than the presentation currency

The items included in the Separate Financial Statements are measured using the currency of the economic environment in which the entity operates (functional currency).

These financial statements are presented in Euro, which is the functional and reporting currency.

Transactions in currencies other than Euro are translated into the functional currency using the exchange rates at the date of the transactions.

The currency differences arising from differences between the exchange rates ruling at the transaction date and those ruling on collection, payment or at the separate statement of financial position date, are recorded as income and expenses in the period (Note 5.10).

The amounts recorded in profit or loss of subsidiaries were translated using the exchange rates prevailing at the dates of the transactions. Where this is not possible, or where the cost of such a procedure exceeds the benefits to be derived therefrom, they have been translated at the average exchange rate for the period.

The differences resulting from the application of these rates compared with the previous values were reflected as a separate component of Equity, under Other reserves (Note 5.5).

Exchange rates used

	31/12/2025	31/12/2024	Appreciation / (Depreciation)
GBP (Sterling pound)			
Average exchange rate for the period	0.8570	0.8466	-1.23%
Closing exchange rate for the period	0.8726	0.8292	-5.23%
USD (American dollar)			
Average exchange rate for the period	1.1307	1.0824	-4.46%
Closing exchange rate for the period	1.1750	1.0389	-13.10%
PLN (Polish zloty)			
Average exchange rate for the period	4.2403	4.3058	1.52%
Closing exchange rate for the period	4.2210	4.2750	1.26%
SEK (Swedish krona)			
Average exchange rate for the period	11.0656	11.4325	3.21%
Closing exchange rate for the period	10.8215	11.4590	5.56%
CHF (Swiss franc)			
Average exchange rate for the period	0.9370	0.9526	1.64%
Closing exchange rate for the period	0.9314	0.9412	1.04%
MZN (Mozambican metical)			
Average exchange rate for the period	72.2667	69.1732	-4.47%
Closing exchange rate for the period	75.0100	66.7900	-12.31%
MAD (Moroccan dirham)			
Average exchange rate for the period	10.5511	10.7549	1.89%
Closing exchange rate for the period	10.7121	10.5190	-1.84%
NOK (Norway krona)			
Average exchange rate for the period	11.7191	11.6290	-0.77%
Closing exchange rate for the period	11.8430	11.7950	-0.41%
MXN (Mexican peso)			
Average exchange rate for the period	21.6737	19.8314	-9.29%
Closing exchange rate for the period	21.1180	21.5504	2.01%
AED (Dirham)			
Average exchange rate for the period	4.1499	3.9751	-4.40%
Closing exchange rate for the period	4.3152	3.8154	-13.10%
ZAR (South African rand)			
Average exchange rate for the period	20.1540	19.8297	-1.64%
Closing exchange rate for the period	19.4439	19.6188	0.89%
BRL (Brazilian real)			
Average exchange rate for the period	6.2936	5.8283	-7.98%
Closing exchange rate for the period	6.4364	6.4253	-0.17%
EGP (Egyptian pound)			
Average exchange rate for the period	55.5640	49.1213	-13.12%
Closing exchange rate for the period	56.1247	53.0349	-5.83%
TRY (Turkish lira)			
Average exchange rate for the period	44.8699	35.5734	-26.13%
Closing exchange rate for the period	50.4838	36.7372	-37.42%

1.3.4. Basis for measurement

The accompanying separate financial statements have been prepared on a going concern basis from Navigator's books and accounting records and based on historical cost, except for financial instruments measured at fair value through profit or loss or at fair value through other comprehensive income (Note 8.3), in which derivative financial instruments are included (Note 8.2). The defined benefit liability is recognised at its present value, after deducting the fair value of the related plan assets.

1.3.5. Comparability

These financial statements are comparable in all material respects with those of the previous year.

In 2025, following a decision by the shareholders of the Company and Navigator Tissue Ibérica, a merger by incorporation was carried out, effective as of 1 January of that year, whereby Navigator Tissue Ibérica was incorporated into The Navigator Company SA – Sucursal en España. The effects of this transaction on the statement of financial position as at that date are as follows:

	As at 1 January 2025			
Amounts in Euros	The Navigator Company	Navigator Tissue Iberica	Adjustments/ Write-offs	The Navigator Company Following the Merger
ASSETS				
Non-current assets				
Property, plant and equipment	1,153,588			1,153,588
Right-of-use assets	1,359,258			1,359,258
Investments in subsidiaries	1,778,826,227		257,003	1,779,083,230
Investments in associates	44,600			44,600
Non-current receivables	6,684			6,684
Deferred tax assets	8,614,912	113,315		8,728,227
	1,790,005,269	**113,315**	**257,003**	**1,790,375,587**
Current assets				
Inventories	27,283,541	763,954		28,047,495
Current receivables	1,034,094,913	40,366,501	(22,936,742)	1,051,524,672
Income tax	19,746,025			19,746,025
Cash and cash equivalents	406,735,567	252,091		406,987,658
	1,487,860,046	**41,382,546**	**(22,936,742)**	**1,506,305,850**
Total Assets	**3,277,865,315**	**41,495,861**	**(22,679,739)**	**3,296,681,437**
EQUITY AND LIABILITIES				
Capital and Reserves				
Share capital	500,000,000	65,000	(65,000)	500,000,000
Reserves by applying the equity method	(395,128,709)			(395,128,709)
Fair value reserves	12,011,454			12,011,454
Legal reserves	100,000,000	13,194	(13,194)	100,000,000
Other reserves	(8,338,101)		-	(8,338,101)
Retained earnings	960,235,449	70,987	(70,987)	960,235,449
Net profit for the period	286,948,195	(406,184)	406,184	286,948,195
Early dividends	(99,999,451)			(99,999,451)
Total Equity	**1,355,728,837**	**(257,003)**	**257,003**	**1,355,728,837**
Non-current liabilities				
Interest-bearing liabilities	707,608,727			707,608,727
Lease liabilities	876,698			876,698
Pensions and other post-employment benefits	408,936			408,936
Deferred tax liabilities	4,728,162			4,728,162
Provisions	16,624,744			16,624,744
	730,247,267	**-**	**-**	**730,247,267**
Current liabilities				
Interest-bearing liabilities	365,423,477			365,423,477
Lease liabilities	587,065			587,065
Current payables	789,671,835	41,730,898	(22,936,742)	808,465,990
Income tax	36,206,834	21,966		36,228,800
	1,191,889,211	**41,752,864**	**(22,936,742)**	**1,210,705,332**
Total Liabilities	**1,922,136,478**	**41,752,864**	**(22,936,742)**	**1,940,952,599**
Total Equity and Liabilities	**3,277,865,315**	**41,495,861**	**(22,679,739)**	**3,296,681,437**

1.4. New IFRS standards adopted and to be adopted

1.4.1. Other standards, amendments and interpretations adopted or to be adopted

Standards, amendments and interpretations adopted in 2025

	Amendment	Date of application
Standards and amendments endorsed by the European Union		
Amendments to IAS 21 - The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability	On August 15, 2023, the International Accounting Standards Board (the IASB or Board) issued Lack of Exchangeability (Amendments to IAS 21 – The Effects of Changes in Foreign Exchange Rates) (the amendments). The amendments clarify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. An entity assesses whether a currency is exchangeable into another currency at a measurement date and for a specified purpose. When a currency is not exchangeable, the entity has to estimate a spot exchange rate. According to the amendments, entities will have to provide new disclosures to help users assess the impact of using an estimated exchange rate on financial statements. These disclosures may include: a) the nature and financial effects of the currency not being exchangeable into the other currency; b) the spot exchange rate(s) used; c) the estimation process; and d) the risks to which the entity is exposed because of the currency not being exchangeable into the other currency. The amendment did not have a significant impact on the Navigator Group.	1 January 2025

	Amendment	Date of application
Standards and amendments endorsed by the European Union that the Group has opted not to apply in advance		
Annual improvements	On 18 July 2024, the International Accounting Standards Board (IASB) issued limited amendments to the IFRS and respective guidelines, resulting from the regular maintenance carried out on the Standards. The amendments include clarifications, simplifications, corrections and modifications made with the aim of improving the consistency of various IFRS. The IASB amended: a) **IFRS 1 First-time Adoption of International Financial Reporting Standards, to clarify certain aspects related to the application of hedge accounting by an entity that is preparing financia**l statements in accordance with IFRS for the first time; b) **IFRS 7 Financial Instruments:** Disclosures and the respective Implementation Guidance, in order to clarify: - The application guidance, regarding Gain and loss on derecognition; and - The implementation guidance, namely its Introduction, Fair value paragraph (disclosures regarding the difference between fair value and transaction price) and Credit risk disclosure. c) **IFRS 9 Financial Instruments** to: - Require companies to initially measure a receivable without a significant financing component at the amount determined by applying IFRS 15, and - Clarify that when a lease liability is derecognised, the derecognition is accounted for under IFRS 9. However, when a lease liability is modified, the modification is accounted for under IFRS 16 Leases. The amendment establishes that when lease liabilities are derecognised under IFRS 9, the difference between the carrying amount and the consideration paid is recognised in profit or loss. d) **IFRS 10 Consolidated Financial Statements**, clarification on the determination of a "de facto agent"; and e) **IAS 7 Cash Flow Statements**, amendment of detail in the paragraph relating to Investments in subsidiaries, associates and joint ventures. This amendment is effective for periods starting after 1 January 2026. Earlier application is permitted.	1 January 2026
IFRS 9 - Amendments to the Classification and Measurement of Financial Instruments	On 30 May 2024, the International Accounting Standards Board (IASB or Board) issued amendments regarding the classification and measurement requirements of IFRS 9 Financial Instruments. The amendments aim to resolve the diversity in the application of the standard, making the requirements more understandable and consistent. The purpose of these amendments is to: a) - Clarify the classification of financial assets with environmental, social and corporate governance (ESG) characteristics and similar, since these characteristics in loans can affect whether loans are measured at amortised cost or fair value. To resolve any potential diversity in practical application, the amendments clarify how the contractual cash flows of loans should be valued. b) - Clarify the date on which a financial asset or financial liability is derecognised when it is settled through electronic payment systems. There is an accounting policy option that allows a financial liability to be Derecognised before the cash is delivered on the settlement date, if certain criteria are met. c) - Improve the description of the term "non-recourse", according to the amendments, a financial asset has non-recourse characteristics if the ultimate right to receive cash flows from an entity is contractually limited to the cash flows generated by specific assets. The presence of non-recourse features does not necessarily exclude the financial asset from complying with the SPPI, but its characteristics need to be carefully analysed. d) - Clarify that a contractually linked instrument must have a cascading payment structure that creates a concentration of credit risk by allocating losses disproportionately between different instalments. The underlying pool can include financial instruments that are not within the scope of the classification and measurement of IFRS 9 (*e.g.* , finance leases) but must have cash flows equivalent to the SPPI criterion. The IASB has also introduced additional disclosure requirements relating to equity investments designated at fair value through other comprehensive income and financial instruments with contingent features, for example features linked to ESG targets. These amendments are effective for periods beginning on or after 1 January 2026. Earlier adoption is permitted.	1 January 2026

Amendments to IFRS 9 and IFRS 7 - Contracts Referencing Nature-dependent Electricity	On 18 December 2024, the International Accounting Standards Board (IASB) issued amendments to help companies better report the financial effects of nature-dependent electricity contracts, which are often structured as power purchase agreements (PPA). Nature-dependent electricity contracts help companies to secure their electricity supply from sources such as wind and solar power. The amount of electricity generated under these contracts can vary based on uncontrollable factors such as weather conditions. Current accounting requirements may not adequately capture how these contracts affect a company's performance. To allow companies to better reflect these contracts in the financial statements, the IASB has made targeted amendments to IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures. The amendments include: a) Clarifying the application of the "own-use" requirements; b) Permitting hedge accounting if these contracts are used as hedging instruments; and c) Adding new disclosure requirements to enable investors to understand the effect of these contracts on a company's financial performance and cash flows. The amendments are effective for periods beginning on or after 1 January 2026. Early application is permitted.	1 January 2026
IFRS 18 - Presentation and disclosure in financial statements	On 9 April 2024, the International Accounting Standards Board (IASB or Board) issued the new standard, IFRS 18 Presentation and Disclosure in Financial Statements. The main amendments introduced by this Standard are: a) promotion of a more structured income statement. In particular, it introduces a new subtotal "operating profit" (as well as its definition) and the requirement that all income and expenses be classified into three new separate categories based on a company's main business activities: Operating, Investing and Financing. b) requirement for companies to analyse their operating expenses directly on the face of the income statement - either by nature, by function or in a mixed way. c) requirement for some of the "non-GAAP" measures that the Group uses to be reported in the financial statements. IFRS 18 defines management-defined performance measure (MPM or non-GAAP Performance Measures) as a subtotal of income and expenses that an Entity uses: - in public communications outside financial statements; and - to communicate management's view of the financial performance. For each MPM presented, companies will need to explain in a single note in the financial statements why the measure provides useful information, how it is calculated, and reconcile it with a value determined in accordance with IFRS. d) introduce improved guidance on how companies group information in financial statements. It includes guidance on whether material information is included in the primary financial statements or is more detailed in the notes. The amendments are effective for periods beginning on or after 1 January 2027 and apply retrospectively. Earlier application is permitted.	1 January 2027

Amendment		Date of application
Standards and amendments not yet endorsed by the European Union		
IFRS 19 Presentation and Disclosure in Financial Statements	On 9 May 2024, the International Accounting Standards Board (IASB) issued the new Standard, IFRS 19 Subsidiaries without Public Accountability: Disclosures, which allows eligible subsidiaries to use IFRS with reduced disclosures. The application of IFRS 19 will reduce the costs of preparing the financial statements of subsidiaries, while maintaining the usefulness of the information for the users of their financial statements. A subsidiary may elect to apply the new Standard in its consolidated, individual or separate financial statements, provided that, at the reporting date: a) It has no public accountability; b) Its parent company prepares consolidated financial statements in accordance with IFRS. A subsidiary that applies IFRS 19 is required to state clearly in its explicit and unconditional statement of compliance with IFRS that IFRS 19 has been adopted. The amendments are effective for annual reporting periods beginning on or after 1 January 2027. The standard is applied retrospectively. Earlier application is permitted.	1 January 2027
Amendments relating to the translation of financial information from a non hyperinflationary currency into a hyperinflationary currency	On 13 November 2025, the International Accounting Standards Board (IASB) issued amendments to IAS 21 – The Effects of Changes in Foreign Exchange Rates, which clarify how entities should translate financial statements from a non-hyperinflationary currency to a hyperinflationary currency. The amendments are effective for periods beginning on or after 1 January 2027. Earlier application is permitted.	1 January 2027

With respect to the above standards, which are not yet mandatory, the Group has not yet completed the calculation of all impacts arising from their application and has therefore elected to apply them early, although these impacts are not expected to be material.

1.5. Significant accounting estimates and judgements

The preparation of separate financial statements requires management to make judgements and estimates that affect the amount of revenue, costs, assets, liabilities and disclosures at the date of the statement of financial position. To that effect, the management's estimates and judgements are based on:

i. the best information and knowledge of current events and in certain cases on the reports of independent experts; and

ii. the actions that the Company considers it may have to take in the future.

On the date on which the operations take place, the outcome could differ from those estimates.

Significant estimates and judgements

The estimates and assumptions which present a significant risk of generating a material adjustment to the book value of assets and liabilities in the following financial period are presented below:

Estimates and judgements	Notes
Uncertainty over Income Tax Treatments	6.1 - Income tax for the period 6.2 - Deferred taxes
Valuation of financial investments	10.1 – Investments in subsidiaries

2. Operational performance

2.1. Revenue and segment reporting

Accounting policies

Within the Navigator Group, the Company operates as a trader of the Group's products and supplier of most of the Group's raw materials.

In preparing the separate financial statements, the accounting policies used by the Company in the areas of revenue and segment reporting are consistent with the policies applied in the consolidated financial statements, as described below.

Navigator Group business areas

The Navigator Group’s main business is the production and sale of writing and printing thin paper (UWF) and domestic consumption paper (Tissue), and it is present in the whole value-added chain, from research and development of forestry and agricultural production to the purchase and sale of wood and the production and sale of bleached eucalyptus kraft pulp – BEKP and electric and thermal energy, as well as its commercialisation. In the last quarter of 2024, the group also started producing

moulded fibre packaging at the Aveiro industrial complex. This new production facility is aimed at a market with high growth potential, fully aligned with the challenges of reducing the use of single-use plastics.

The Navigator Group currently has ten industrial sites – four in Portugal, one in Spain and five in the United Kingdom. Of the industrial complexes in Portugal, two are dedicated to the production of BEKP pulp, electricity and UWF paper (Figueira da Foz and Setúbal), one is dedicated to the production of BEKP pulp, energy, moulded cellulose packaging and tissue paper (Aveiro) and a fourth, in Vila Velha de Ródão, produces tissue. In Spain, the Group owns an industrial complex in Zaragoza where it produces tissue paper. In May 2024, with the acquisition of the Navigator Tissue UK Group (formerly the Accrol Group), the Navigator Group now has five production sites in the UK related to the tissue business: Blackburn (facials); Leicester (rolls); Leyland (rolls); Flint (wet wipes) and Bridgewater (wet wipes).

With the aim of strengthening its leading position in tissue paper production and ensuring greater operational resilience, the Navigator Group implemented in 2025 a strategic plan to consolidate its tissue roll operations (toilet and kitchen rolls) in the United Kingdom, which is expected to be completed in 2026.

This consolidation of the tissue roll operations in two strategic locations, Leyland and Leicester, will enable the optimisation of supply to the North and South of England, ensuring greater proximity to the main consumption centres and improved logistical coverage of the UK market. The new operating model combines manufacturing and storage capacity into a more agile and efficient system, designed to scale up operations, reduce fixed costs and improve the efficiency of the supply chain.

Wood is produced from woodlands owned or leased by the Group in Portugal and Spain and also from granted lands in Mozambique. The production of cork and pine wood are sold to third parties while the eucalyptus wood is mainly consumed in the production of BEKP.

A significant portion of the Group's own BEKP production is consumed in the production of UWF and tissue paper. Sales of BEKP and UEKP pulp, UWF paper and tissue paper are made to 112 (2024: 118) countries and territories worldwide.

With regard to energy production, the Navigator Group operates three renewable cogeneration plants, integrated into its pulp production operations, generating steam and electricity, with the former consumed internally and the latter largely sold to the national power grid, although a portion is also used for self-consumption. The Group also operates two natural gas-fired cogeneration plants integrated into paper production, located in Figueira da Foz and Setúbal, as well as two standalone plants fuelled by residual forest biomass, with the electricity produced being sold to the national power grid under contracts in force until 2034.

In addition, the Group currently has nine photovoltaic plants in operation for self-consumption: three in Setúbal – two at the factory complex and one at Herdade de Espirra, two at the Figueira da Foz industrial complex, one at the Zaragoza industrial complex, one at Raiz (in Aveiro) and also two plants at the Aveiro and Vila Velha de Ródão industrial complexes.

With the conclusion of the construction of new photovoltaic plants, on a self-consumption basis, at the industrial sites of Figueira da Foz, Aveiro and Vila Velha de Ródão, Navigator, with around 38 MW of installed photovoltaic solar energy capacity, has become the largest self-consumption producer in Portugal, in an industrial context.

Segment reporting

In accordance with IFRS 8, the Company considers an operating segment as a component of the group that develops business activities from which it can obtain revenue and incur expenses, whose operating profit or loss are regularly reviewed by the Executive Committee, which is primarily responsible for the operational decision-making for allocation of resources to the segment and the assessment of its performance and for which separate financial information is available.

The information used in segment reporting corresponds to the financial information prepared by the Company.

Although the Group has defined a series of segments, Navigator is only responsible for the marketing of the products produced by its subsidiaries and for the management of those subsidiaries. Therefore, it is considered that all the Company's activities fall into one single segment and so no further breakdown is required.

Revenue

Revenue is presented by goods and services sold and by geographic area, based on the country of destination of the goods and services sold by the Company.

Commercial contracts with Customers refer essentially to the sale of goods such as paper, tissue and pulp, and to the transportation inherent to those goods, when applicable.

Revenue recognition by group of materials is described as follows:

Pulp	Pulp revenue results from sales made to the Company's subsidiaries and international producers of paper and decoration. Revenue is recognised at a specific time, by the amount of the performance obligation satisfied, the price of the transaction corresponding to a fixed amount invoiced on the basis of quantities sold, less cash discounts and quantity discounts, which are reliably determinable. On the export side, the transfer of control of the products generally occurs when the products are transferred to the control of the customer, in accordance with the negotiated Incoterms. The Company is solely responsible for selling BEKP pulp produced by Navigator Group companies, intended for sale to the market and to the Group's UWF paper and tissue producers.
UWF	Paper revenue refers to sales made through Commercial Distributors (B2B) which include large distributors, wholesalers or commercial operators. Revenue is recognised at a specific time, on the date of delivery of the product to the customer when the transfer of control occurs, by the amount of the performance obligation satisfied, and the price of the transaction corresponds to a fixed amount invoiced according to the quantities sold, less cash discounts and quantity discounts, which are reliably determinable. On the export side, the transfer of control of the products occurs in general when there is a transfer of control to the Customer, according to the Incoterms negotiated.
Tissue	Tissue revenue results from sales of tissue paper produced for the private label of national and international retail chains. Revenue is recognised at a specific point in time—on the date the product is delivered to the customer, when control is transferred—in the amount of the performance obligation satisfied, provided that the transaction price corresponds to a fixed amount invoiced based on the quantities sold, net of cash discounts and volume discounts, which are determined reliably. On the export side, the transfer of control of the products occurs in general when there is a transfer of control to the Customer, according to the Incoterms negotiated.
Central purchasing operations	The revenue from goods purchased from producers and distributors to supply the Group's plants that use them as raw materials for processing is recognised on the date of delivery of the product to the customer, for the amount of the performance obligation satisfied, where the transaction price corresponds to a fixed amount invoiced based on the quantities sold that can be reliably determined.

Detail of revenue by materials/services groups and geographical areas

During the periods ended 31 December 2025 and 2024, the revenue from sales of goods and rendering of services is detailed as follows:

Amounts in Euros	2025	2024
Sales		
UWF Paper		
Portugal	61,648,702	66,040,792
Rest of Europe	665,171,326	734,930,491
United States of America	51,316,929	67,177,021
Rest of the World	390,862,358	385,196,738
	1,168,999,315	**1,253,345,041**
Tissue Paper		
Portugal	98,067,427	102,874,540
Rest of Europe	284,043,911	171,013,243
Rest of the World	4,285,265	3,271,959
	386,396,603	**277,159,743**
Market Pulp		
Portugal	8,178,745	11,395,309
Rest of Europe	110,674,442	139,047,737
Rest of the World	56,349,907	87,286,968
	175,203,094	**237,730,015**
Pulp supplied to subsidiaries		
Portugal	474,781,325	640,288,946
Rest of Europe	16,058,235	20,011,226
	490,839,560	**660,300,173**
Sales of goods - subsidiaries	303,936,547	292,069,555
Total sales	**2,525,375,119**	**2,720,604,526**
Services rendered		
Management and administrative services of subsidiaries	99,582,573	114,048,554
Total services rendered	**99,582,573**	**114,048,554**
Total revenue	**2,624,957,692**	**2,834,653,080**

In 2025, the Company had a turnover of Euro 2,624,957,692, with sales of UWF paper accounting for around 45% of turnover (2024: 44%), pulp sales 25% (2024: 32%), tissue paper sales 15% (2024: 10%) and sales of raw materials to supply the Group's plants 12% (2024: 10%).

The Pulp and Paper sector came under significant pressure, evidenced by a sharp decline in pulp prices in China after April, with repercussions in Europe. Against a backdrop of widespread price declines, Navigator continued to maintain a solid market position. Its broad international presence and business diversification strategy enabled the Group to seize opportunities, grow volumes and gain market share.

Portfolio transformation now stands out as an effective driver of resilience, already reflected in the sales mix. Tissue is a clear example of this trend, having increased from approximately 5% to about a quarter of total revenue over the course of a decade, driven by acquisitions and organic growth. Simultaneously, the packaging business line, developed entirely in-house, is expected to account for over 4% of sales by 2025.

Vertical integration, combined with the efficiency and flexibility of its business model, provides Navigator with competitive edge and paves the way for alternative growth strategies. Business diversification and innovation in new products remain key strategic pillars, complementing the commercial strategy and geographical expansion.

Services rendered to subsidiaries essentially include corporate services related to the strategic orientation of holdings and an intermediation fee for managing the wood supply of the Group's pulp producers.

2.2. Other operating income

For the periods ended 31 December 2025 and 2024, Other operating income is detailed as follows:

Amounts in Euros	2025	2024
Supplementary gains	686,811	129,263
Gains on disposal of non-current assets	-	341
Impairment reversal on receivables	167,276	1,378,213
Impairment reversal on inventories (Note 4.1.3)	-	345,491
Discounts received on purchase	518,639	454,475
Compensation	646,139	428,875
Other operating income	2,614,148	1,301,356
	4,633,013	**4,038,014**

2.3. Other operating expenses

Amounts in Euros	2025	2024
Cost of goods sold and materials consumed (Note 4.1.2)	**2,279,508,173**	**2,476,330,691**
External services and supplies		
Transportation of goods	118,440,612	119,745,253
Specialised services	122,865,884	81,710,937
Royalties	12,302,776	23,553,592
Fees and commissions	1,005,945	1,247,887
Insurance	2,168,217	2,467,128
Rentals	1,418,398	1,221,239
Fees	1,069,416	1,223,860
Travel and accommodation	859,028	895,354
Advertising and marketing	814,870	643,642
Representation costs	340,173	425,973
Other	717,781	494,251
	262,003,100	**233,629,116**
Payroll costs (Note 7.1)	**10,249,496**	**5,593,834**
Other operating expenses		
Impairment losses on inventories (Note 4.1.3)	243,026	5,072
Impairment losses on receivables	19,296	173,733
Other inventory losses (Note 4.1.2)	2,020,850	1,935,119
Donations	39,528	32,936
Membership fees	366,634	319,622
Indirect taxes	400,132	51,052
Other operating expenses	445,508	141,836
	3,534,974	**2,659,370**
Net provisions (Note 9.1)	180,561	**23,630**
Total operating expenses	**2,555,295,743**	**2,718,213,011**

In 2025, the Company recorded a reduction in costs, consistent with the decrease in quantities sold, which was mainly reflected in lower costs of goods and transportation.

Specialised services includes marketing and sales agency services amounting to Euro 16,317,025 (2024: Euro 21,428,790), general administrative services amounting to Euro 35,792,203 (2024: Euro 35,122,299) invoiced by Navigator Pulp Figueira, S.A., and, additionally, in 2025, miscellaneous services invoiced by Navigator Pulp Figueira, S.A. (Euro 11,787,337), Navigator Pulp Aveiro, S.A. (Euro 21,887,353), Navigator Pulp Setúbal, S.A. Euro 8,587,194).

Audit fees

	2025		2024	
Amounts in Euros	**Expenses for the period**	**Fees invoiced**	**Expenses for the period**	**Fees invoiced**
KPMG (SROC) and other entities belonging to the same network				
Audit fees	347,814	552,226	464,611	252,500
Other assurance services	50,000	83,750	97,000	116,500
Other services	-	-	331,778	331,778
	397,814	**635,976**	**893,390**	**700,778**

The services indicated as Other assurance services relate to the reporting of financial information and Sustainability Information verification services.

The Board of Directors considers that sufficient safeguards are in place to ensure the independence of the auditors, through the approval processes of the Supervisory Board, the nature of the proposed engagements and their careful definition at the contracting stage.

3. Investments

3.1. Property, plant and equipment

Movements in property, plant and equipment

Amounts in Euros	Land	Buildings and other constructions	Basic equipment	Transportation equipment	Administrative equipment	Other property, plant and equipment	Assets under construction	Total
Gross amount								
Balance as at 1 January 2024	**7,457**	**693,726**	**1,374,499**	**3,664,577**	**4,125,122**	**10,582,638**	**-**	**20,448,019**
Acquisitions	-	-	-	-	-	-	323,689	323,689
Disposals	-	-	-	-	-	-	-	-
Adjustments, transfers and write-offs	-	-	-	-	-	-	-	-
Balance as at 31 December 2024	**7,457**	**693,726**	**1,374,499**	**3,664,577**	**4,125,122**	**10,582,638**	**323,689**	**20,771,708**
Adjustments, transfers and write-offs	-	-	-	-	-	323,689	(323,689)	-
Balance as at 31 December 2025	**7,457**	**693,726**	**1,374,499**	**3,664,577**	**4,125,122**	**10,906,327**	**-**	**20,771,708**
Accumulated depreciation and impairment losses								
Balance as at 1 January 2024	**-**	**(92,354)**	**(1,373,821)**	**(3,563,029)**	**(4,076,125)**	**(10,433,455)**	**-**	**(19,538,787)**
Depreciation for the period (Note 3.3)	-	(14,791)	(387)	(13,011)	(7,778)	(43,366)	-	(79,333)
Disposals	-	-	-	-	-	-	-	-
Adjustments, transfers and write-offs	-	-	-	-	-	-	-	-
Balance as at 31 December 2024	**-**	**(107,145)**	**(1,374,208)**	**(3,576,040)**	**(4,083,903)**	**(10,476,821)**	**-**	**(19,618,120)**
Depreciation for the period (Note 3.3)	-	(13,838)	(291)	(13,010)	(7,465)	(104,718)	-	(139,322)
Balance as at 31 December 2025	**-**	**(120,983)**	**(1,374,499)**	**(3,589,050)**	**(4,091,368)**	**(10,581,539)**	**-**	**(19,757,439)**
Net book value as at 1 January 2024	**7,457**	**601,372**	**678**	**101,548**	**48,997**	**149,183**	**-**	**909,232**
Net book value as at 31 December 2024	**7,457**	**586,581**	**291**	**88,537**	**41,219**	**105,817**	**323,689**	**1,153,588**
Net book value as at 31 December 2025	**7,457**	**572,743**	**-**	**75,527**	**33,754**	**324,788**	**-**	**1,014,269**

Accounting policies

Recognition and initial measurement

Property, plant and equipment acquired up to 1 January 2004 (transition date to IFRS) are recorded at acquisition cost, or revalued acquisition cost in accordance with generally accepted accounting principles in Portugal until that date, net of amortisation and accumulated impairment losses.

Property, plant and equipment acquired after the transition date are shown at cost, less accumulated depreciation and impairment losses.

Depreciation and impairment

We use the straight-line method from the moment the asset is available for use and using the rates that best reflect their estimated useful life.

	Average useful life	
	2025	2024
Buildings and other constructions	20 – 50	20 – 50
Basic equipment	7 – 35	7 – 35
Transportation equipment	4 – 9	4 – 9
Administrative equipment	4 – 8	4 – 8
Other property, plant and equipment	3 – 21	3 – 21

The residual values of the assets and respective useful lives are reviewed and adjusted, on the date of the Separate statement of financial position. When the carrying amount of the asset exceeds its realisable value, the asset is written down to the estimated recoverable amount, and an impairment charge is booked.

Subsequent costs

Scheduled maintenance expenses are considered a component of the acquisition cost of property, plant and equipment and are fully depreciated by the next forecasted maintenance date.

All other repairs and maintenance costs are charged to the income statement in the financial period in which they are incurred.

Write-offs and disposals

Gains or losses arising from write-offs or disposals are determined by the difference between the proceeds from the disposals when applicable less transaction costs and the carrying amount of the asset and are recognised in the income statement as Other operating income (Note 2.2) or Other operating expenses (Note 2.3).

3.2. Right-of-use assets

Movements in right-of-use assets

Amounts in Euros	Buildings	Vehicles	Total
Gross amount			
Balance as at 1 January 2024	**4,331,251**	**19,284**	**4,350,535**
Acquisitions	-	-	-
Adjustments, transfers and write-offs	117,680	(3,092)	114,588
Balance as at 31 December 2024	**4,448,931**	**16,192**	**4,465,123**
Acquisitions	26,503	-	26,503
Adjustments, transfers and write-offs	-	(16,192)	(16,192)
Balance as at 31 December 2025	**4,475,434**	**-**	**4,475,434**
Accumulated depreciation and impairment losses			
Balance as at 1 January 2024	**(2,543,565)**	**(19,284)**	**(2,562,849)**
Depreciation (Note 3.3)	(546,109)	(2,018)	(548,127)
Adjustments, transfers and write-offs	-	5,110	5,110
Balance as at 31 December 2024	**(3,089,673)**	**(16,192)**	**(3,105,865)**
Depreciation (Note 3.3)	(569,879)	-	(569,879)
Adjustments, transfers and write-offs	-	16,192	16,192
Balance as at 31 December 2025	**(3,659,552)**	**-**	**(3,659,552)**
Net book value as at 1 January 2024	**1,787,686**	**-**	**1,787,686**
Net book value as at 31 December 2024	**1,359,258**	**-**	**1,359,258**
Net book value as at 31 December 2025	**815,882**	**-**	**815,882**

The caption Buildings refers to the lease agreement entered into between The Navigator Company, S.A. e a MaxiRent - Fundo de Investimento Imobiliário Fechado for the building located at Avenida Fontes Pereira de Melo 27, in Lisbon, for use as an office until May 2027.

Accounting policies

At the date the lease enters into force, the Company recognises a right-of-use asset at its cost, which corresponds to the initial amount of the lease liability adjusted for: i) any prepayments; ii) lease incentives received; and iii) initial direct costs incurred.

To the right-of-use asset, the estimate of removing and/or restoring the underlying asset and/or the location where it is located may be added, when required by the lease agreement.

The right-of-use asset is subsequently depreciated using the straight-line method, from the start date until the lower between the end of the asset's useful life and the lease term. Additionally, the right-of-use asset reduced of impairment losses, if any, and adjusted for any remeasurement of the lease liability. The useful life considered for each class of right-of-use asset is equal to the useful life of Property, plant and equipment (Note 3.1) in the same class when there is a call option and the Company expects to exercise it.

Short-term leases and low-value asset leases

The Company recognises payments for leases of 12 months or less and for leases of assets whose individual acquisition value is less than USD 5,000 directly as operating expenses of the period (Note 2.3), on a straight-line basis.

3.3. Depreciation, amortisation and impairment losses

Amounts in Euros	2025	2024
Depreciation of property, plant and equipment for the period (Note 3.1)	139,322	79,333
Utilisation of government grants	(115)	(841)
Depreciation of property, plant and equipment, net of utilised grants	**139,207**	**78,492**
Depreciation of right-of-use assets for the period (Note 3.2)	**569,879**	**548,125**
	709,086	**626,617**

4. Working capital

4.1. Inventories

4.1.1. Inventories - detail by nature

Amounts net of accumulated impairment losses

Amounts in Euros	31/12/2025			31/12/2024		
	Gross amount	**Impairment**	**Net amount**	**Gross amount**	**Impairment**	**Net amount**
BEKP Pulp	3,378,969	(17,572)	3,361,397	4,767,828	(17,571)	4,750,257
UWF Paper	5,509,913	(998,754)	4,511,159	17,949,366	(759,316)	17,190,050
Tissue Paper	1,703,262	(2,420)	1,700,842	453,063	(2,420)	450,643
Goods supplied to the Group's plants	6,345,502	(147,419)	6,198,083	5,038,724	(146,133)	4,892,591
Total	**16,937,646**	**(1,166,165)**	**15,771,481**	**28,208,981**	**(925,440)**	**27,283,541**

Inventories – distribution by geographical area

Amounts in Euros	31/12/2025	%	31/12/2024	%
Portugal				
BEKP Pulp	459,456	2.71%	-	0.00%
UWF Paper	514,976	3.04%	8,379,808	29.71%
Tissue Paper	1,044,992	6.17%	450,643	1.60%
Goods used for Group supply	6,345,502	37.46%	5,038,724	17.86%
	8,364,926	**49.38%**	**13,869,175**	**49.17%**
Rest of Europe				
BEKP Pulp	2,919,513	17.24%	4,767,828	16.90%
UWF Paper	4,994,937	29.49%	9,569,558	33.92%
Tissue Paper	658,270	3.89%	2,420	0.01%
	8,572,720	**50.62%**	**14,339,806**	**50.83%**
	16,937,646	**100.00%**	**28,208,981**	**100.00%**

The Company's inventories include Euro 1,205,671 (2024: Euro 8,830,451) relating to UWF paper, tissue paper and pulp for which invoices have already been issued but whose control has not been transferred to Trade receivables.

As at 31 December 2025 and 2024, there are no inventories in which ownership is restricted and/or pledged as collateral for liabilities.

4.1.2. Cost of goods sold and materials consumed in the period

Amounts in Euros	2025	2024
Opening balance	27,283,541	32,116,019
Purchases	2,270,259,988	2,473,092,913
Gains/ (losses) on inventories (Note 2.3)	(2,020,850)	(1,935,119)
Gains / (losses) on impairment (Notes 2.2 and 2.3)	(243,026)	340,419
Closing balance	(15,771,481)	(27,283,541)
Cost of goods sold and materials used (Note 2.3)	**2,279,508,173**	**2,476,330,691**

Costs of goods and materials consumed by type

Amounts in Euros	2025	2024
BEKP Pulp – Sales to market	155,127,539	224,763,542
BEKP Pulp – Incorporation into the Group	490,320,373	658,246,874
UWF Paper	925,278,672	1,011,660,977
Tissue Paper	404,819,901	289,304,756
Goods supplied to the Group's plants	303,961,688	292,354,542
	2,279,508,173	**2,476,330,691**

4.1.3. Movements in impairment losses in inventories

Amounts in Euros	2025	2024
Opening balance	(925,440)	**(1,265,859)**
Increases (Note 2.3)	(243,026)	(5,072)
Reversals (Note 2.2)	-	345,491
Impact on profit or loss for the period	(243,026)	**340,419**
Utilisations	-	-
Closing balance	**(1,168,466)**	**(925,440)**

The impairment losses on inventories recorded in 2025 and 2024 relate to adjustments in the stock of UWF paper.

Accounting policies

Goods

The goods held by Navigator correspond essentially to eucalyptus pulp, UWF paper and tissue paper acquired from its subsidiaries, for sale to the market. It also includes materials acquired from third parties to supply subsidiaries as part of the Navigator Group's central purchasing functions.

The Company acts as the Navigator Group's central purchasing body, and most of the Group's purchases of raw materials are made centrally by the Company, which then supplies the manufacturing companies, except for wood supply.

Goods and raw, subsidiary and consumable materials are valued at the lower of their purchase cost or their net realisable value. The purchase cost includes ancillary costs and it is determined using the weighted average cost as the valuation method.

4.2. Receivables

Amounts in Euros	31/12/2025 Non-current	31/12/2025 Current	31/12/2025 Total	31/12/2024 Non-current	31/12/2024 Current	31/12/2024 Total
Trade receivables	-	245,934,570	245,934,570	-	216,728,199	216,728,199
Receivables - related parties (Note 10.2)	-	661,801,405	661,801,405	-	681,801,808	681,801,808
State	-	26,202,419	26,202,419	-	47,422,025	47,422,025
Tax consolidation - related parties (Note 10.2)	-	18,483,134	18,483,134	-	59,762,374	59,762,374
Accrued income	-	3,314,207	3,314,207	-	4,485,516	4,485,516
Deferred expenses	-	-	-	-	-	-
Derivative financial instruments (Note 8.2)	-	8,742,410	8,742,410	-	21,022,302	21,022,302
Advances to suppliers	-	4,255,049	4,255,049	-	2,603,887	2,603,887
Other receivables	6,684	245,775	252,459	6,684	268,802	275,486
	6,684	**968,978,969**	**968,985,653**	**6,684**	**1,034,094,913**	**1,034,101,597**

The amounts above are net of accumulated impairment losses. Analysis of impairment for receivables is presented in Note 8.1.4 - Credit risk.

The reduction in this caption is primarily due to the decrease in energy and Government hedging instruments. In turn, the increase in Trade receivables results from the merger of Navigator Tissue Ibérica with The Navigator Company – Spanish Branch (involving sales to end customers), a transaction that led to the offsetting of receivables from related parties.

Other - non-current

The amount recorded as non-current in 2025 is related to a VAT guarantee in connection with the Company's VAT registration in Switzerland, amounting to Euro 6,684.

State

Amounts in Euros	31/12/2025	31/12/2024
Value added tax - recoverable	2,362,307	7,146,118
Value Added Tax - repayment requests	23,840,112	40,275,907
	26,202,419	**47,422,025**

Up to the date of issuing this report, the outstanding amounts as at 31 December 2025, had already been received.

The amounts requested as at 31 December 2024, Euro 40,275,907 were received during the first quarter of 2025.

Accounting policies

Trade and other receivables

Classification
Trade receivables balances result from the Company's main activities and the business model followed is the collection of contractual cash flows.

Balances from other receivables generally assume the business model of collecting contractual cash flows.

Initial measurement
At fair value.

Subsequent measurement
At amortised cost, net of impairment losses.

Impairment from Trade receivables
Impairment losses are recorded based on the simplified model provided for in IFRS 9, recording expected losses until maturity. The expected losses are determined on the basis of the experience of historical actual losses over a statistically significant period and representative of the specific characteristics of the underlying credit risk (Note 8.1.4).

Impairment from other receivables
Impairment losses are recorded on the basis of the general estimated credit loss model of IFRS 9.

4.3. Payables

Amounts in Euros	31/12/2025	31/12/2024
Trade payables	78,070,782	76,061,929
Payables - related parties (Note 10.2)	510,897,516	533,952,927
State	4,598,255	2,160,781
Advances from customers	7,915,603	8,898,449
Profit attributable to shareholders	-	99,999,451
Other payables	9,967,289	10,966,313
Derivative financial instruments (Note 8.2)	7,990,119	6,311,499
Payroll costs accruals	5,518,247	7,106,789
Accrued expenses - interest payable	4,331,113	4,733,532
Accrued expenses - logistics and sales commissions	15,156,939	14,844,173
Accrued expenses - related parties (Note 10.2)	36,706,322	22,755,799
Other accrued expenses	2,719,109	1,818,743
Deferred income - operating grants	55,324	61,450
	683,926,618	**789,671,835**

The decrease in this caption is mainly the result of the Company's Board of Directors' decision on 19 December 2024, to pay an early dividend of Euro 99,999,451 (Note 5.4), which was paid on 9 January 2025.

State

Amounts in Euros	31/12/2025	31/12/2024
Personal income tax withholds (IRS)	333,016	485,334
Value added tax	3,814,089	1,227,802
Social Security contributions	451,150	447,645
	4,598,255	**2,160,781**

The increase in the amount payable to the State is primarily due to the increase recorded in VAT payable, resulting from sales made by the branch in the Spanish market.

As at 31 December 2025 and 2024, there were no arrears with the State.

Other payables

As at 31 December 2025, this caption essentially includes the amount of Euro 9,917,200 (2024: Euro 10,801,575) payable to IFC – International Finance Corporation, in accordance with the contract described in Note 5.5. In October 2025, the exchange rate was fixed through a hedging derivative.

Accounting policies

Trade payables and other current liabilities are initially recorded at their fair value and subsequently measured at amortised cost.

5. Capital structure

5.1. Capital management

Capital management policy

For capital management purposes, the Company defines capital as including equity and net debt. The Company's objectives in relation to capital management are:

i. To safeguard the Company's ability to continue as a going concern and thus provide returns for Shareholders and benefits for its remaining Stakeholders;

ii. To keep a solid capital structure to support the growth of its business; and

iii. To maintain an optimal capital structure that enables it to reduce the cost of capital.

In order to maintain or adjust its capital structure, the Company can adjust the amount of dividends payable to its Shareholders, return capital to its Shareholders, issue new shares or sell assets to lower its borrowings.

In line with the sector, the Company monitors its capital based on the gearing ratio, defined as the proportion between net debt and total capital.

Net interest-bearing debt is calculated by adding the total amount of loans (including the current and non-current portions as disclosed in the statement of financial position) and deducting all cash and cash equivalents. Total equity is calculated by adding Shareholders' equity (as shown in the statement of financial position), to interest-bearing net debt, and excluding treasury shares and non-controlling interests.

The Company calculates the gearing ratio as follows:

Amounts in Euros	31/12/2025	31/12/2024
Interest-bearing liabilities (Note 5.6)	963,710,845	1,073,032,204
Cash and cash equivalents (Note 5.8)	(456,494,930)	(406,735,567)
Net debt	**507,215,915**	**666,296,637**
Equity	1,412,739,026	1,355,728,837
Treasury shares	-	-
Shareholders' equity, excluding treasury shares	**1,412,739,026**	**1,355,728,837**
Total equity	**1,919,954,941**	**2,022,025,474**
Gearing	**26.42%**	**32.95%**

5.2. Share Capital and treasury shares

The Navigator Company, S.A. is a public company with its shares quoted on the Euronext Lisbon.

As at 31 December 2025, The Navigator Company, S.A.'s share capital of Euro 500,000,000 was fully subscribed and is represented by 711,183,069 shares without nominal value (31 December 2024: 711,183,069 shares).

As at 31 December 2025 and 2024, the Shareholders with qualified shareholdings in the Company's capital were as follows:

	31/12/2025		31/12/2024	
Entity	**No. of shares**	**%**	**No. of shares**	**%**
Semapa, SGPS, S.A.	498,042,299	70.03%	498,042,299	70.03%
Floating shares	213,140,770	29.97%	213,140,770	29.97%
	711,183,069	**100.00%**	**711,183,069**	**100.0%**

As at 31 December 2025, the unit value of each share was Euro 3.14 (31 December 2024: Euro 3.59) and the market capitalisation of the Company at this date amounted to Euro 2,233,114,837 (31 December 2024: Euro 2,553,147,218), compared to equity of Euro 1,412,739,028 (31 December 2024: Euro 1,355,728,837).

Accounting policies

Ordinary shares are classified in Shareholders' equity.

Costs directly attributable to the issue of new shares or other equity instruments are reported as a deduction, net of taxes, from the proceeds of the issue.

Costs directly attributable to the issue of new shares or options for the acquisition of a new business are deducted from the amount issued.

When such shares are subsequently disposed or reissued, any proceeds, net of the directly attributable transaction costs and taxes, is directly reflected in the Shareholders' equity and not in profit or loss for the period.

5.3. Earnings per share

	2025	2024
Profit attributable to Navigator's equity holders (Euro)	**144,667,435**	**286,948,195**
Total number of shares issued	711,183,069	711,183,069
Weighted average number of shares	**711,183,069**	**711,183,069**
Basic earnings per share (Euro)	**0.203**	**0.403**
Diluted earnings per share (Euro)	**0.203**	**0.403**

Accounting policies

Basic earnings per share are determined based on the division of profits or losses attributable to the ordinary Shareholders of the Company by the weighted average number of common shares outstanding during the period.

For the purpose of calculating diluted earnings per share, the Company adjusts the profits or losses attributable to ordinary equity holders, as well as the weighted average number of outstanding shares for the purposes of all potential dilutive common shares.

5.4. Dividends

Amounts in Euros	Amount approved	Dividends per share (Euro)
Allocations in 2025		
Distribution of retained earnings	74,994,255	0.105
Early dividend resolution	-	-
Allocations in 2024		
Distribution of retained earnings	149,995,621	0.211
Early dividend resolution	99,999,451	0.141

At the Annual General Meeting held on 29 May 2025, The Navigator Company, S.A. resolved to distribute dividends amounting to Euro 174,993,706, of which Euro 99,999,451 were paid to Shareholders on 9 January 2025 as an advance on 2024 profits, in accordance with the resolution of the Board of Directors of The Navigator Company, S.A. on 19 December 2024.

At the Annual Shareholders' Meeting of 24 May 2024, The Navigator Company, S.A. decided to distribute dividends in the amount of Euro 149,995,621.

Accounting policies

The distribution of dividends to equity holders is recognised as a liability in the Financial Statements in the period in which the dividends are approved by the Shareholders at the General Shareholders Meeting and up until the time of their payment or, in the case of anticipated distributions, when approved by the Board of Directors.

5.5. Reserves and Retained earnings

Amounts in Euros	31/12/2025	31/12/2024
Reserves by applying the equity method	(395,801,293)	(395,128,709)
Fair value reserve	302,772	12,011,454
Legal reserve	100,000,000	100,000,000
Free reserves	3,481,014	3,481,014
Other reserves	(12,039,340)	(11,819,114)
Retained earnings	1,072,128,442	960,235,449
Reserves and retained earnings	**768,071,591**	**668,780,094**

Reserves by applying the equity method – details

Company	31/12/2025	31/12/2024
Subsidiaries		
Navigator Paper Southern Africa	(130)	54
Navigator Brands, S.A.	(483,165,013)	(489,090,119)
Navigator Pulp Aveiro, S.A.	(7,936,300)	(7,936,300)
Enerpulp, S.A.	154,000	154,000
Navigator Parques Industriais, S.A.	(1,499,369)	(1,499,369)
Portucel Moçambique, S.A.	23,928,957	25,229,195
Navigator Pulp Setúbal, S.A.	154,001	154,001
Navigator Pulp Figueira, S.A.	615,954	615,954
Navigator Forest Portugal, S.A.	1,283,019	739,554
Navigator Paper Setúbal, S.A.	(12,079,548)	(6,108,693)
Navigtor Tissue Aveiro, S.A.	2,117,122	2,117,121
Navigator Paper Figueira, S.A.	79,783,695	79,783,696
Raíz - Inst. Investigação Floresta e Papel	858,207	729,654
Empremédia - Corretores de Seguros, S.A.	248,322	246,570
Empremedia DAC	(222,470)	(222,470)
Navigator Paper Mexico	(41,699)	(41,677)
Navigator Egypt	(41)	120
Subsidiaries	**(395,801,293)**	**(395,128,709)**

Fair value reserves– details

	31/12/2025			31/12/2024		
Amounts in Euros	**Gross amount**	**Tax**	**Net amount**	**Gross amount**	**Tax**	**Net amount**
Interest rate risk hedging	5,968,268	(1,521,908)	4,446,360	5,068,875	(1,343,252)	3,725,623
Foreign exchange risk hedging and other hedges	(500,830)	127,712	(373,118)	11,273,239	(2,987,408)	8,285,830
Energy price risk hedging	(5,061,033)	1,290,563	(3,770,470)			-
	406,405	**(103,633)**	**302,772**	**16,342,114**	**(4,330,660)**	**12,011,454**

Fair value reserves - movements

Amounts in Euros	31/12/2025	31/12/2024
Opening balance	**12,011,454**	**12,898,767**
Change in the fair value of derivative financial instruments (Note 8.2)	(15,935,709)	(1,526,544)
Deferred tax (Note 6.2)	4,227,027	639,231
Closing balance	**302,772**	**12,011,454**

Movements in Other reserves

In 2014, the Company signed agreements with IFC – Internacional Finance Corporation, a Subscription Agreement and a Put and Call option for the entry of this institution into the share capital of the subsidiary Portucel Moçambique, S.A., thus ensuring the construction phase of the Group's forestry project in Mozambique. In 2015, this Company performed a capital increase from MZM 1,000 million to MZM 1,680.798 million subscribing MZM 332,798 million corresponding to 19.98% of the capital at that date.

In February 2019, there was a reduction in the subscribed, underwritten and paid-up capital of the shareholder The Navigator Company, S.A. to MZM 456,596,000, corresponding to 90.02% of the Company's share capital, and the IFC's holding was revised to MZM 50,620,000, corresponding to 9.98% of the Portucel Moçambique's share capital.

On 19 December 2023, an addendum was made to the agreements initially signed with the IFC - International Finance Corporation, extending the date of entry of this institution into the capital of the subsidiary Portucel Moçambique, S.A. from 31 December 2023 to 31 December 2028.

In 2024, the Group considered that the put option on the shares of the subsidiary Portucel Moçambique, S.A. to The Navigator Company, S.A. by IFC – International Finance Corporation was expected to be exercised and recorded the amount of Euro 9,441,850 relating to that transaction under Other reserves, which is updated on an annual basis by the amount of accrued interest.

Accounting policies

Reserves by applying the equity method

Corresponds to the accumulated change in changes in equity in the Company's subsidiaries whose investment is measured by the equity method (Note 10.1). In accordance with the Portuguese commercial legislation, these reserves are not distributable.

Fair value reserves

It corresponds to the accumulated change in fair value of derivative financial instruments classified as hedging instruments (Note 8.2), net of deferred taxes.

Changes related to derivatives are reclassified to profit or loss for the period (Note 5.10) as the hedged instruments affect profit or loss for the period. The fair value adjustments of financial investments recorded under this caption is not recycled to profit or loss.

Legal reserve

The Portuguese commercial legislation prescribes that at least 5% of annual net profit must be transferred to the legal reserve, until this is equal to at least 20% of the share capital. This reserve cannot be distributed unless the company is liquidated. It may, however, be drawn on to absorb losses, after other reserves are exhausted, or incorporated in the share capital.

The legal reserve is constituted by its maximum amount in the periods presented.

Other reserves

This caption corresponds to reserves constituted through the transfer of prior period's profit or other movements. The portion of the balance corresponding to the acquisition value of treasury shares held is not distributable (Note 5.2).

5.6. Interest-bearing liabilities

	31/12/2025			31/12/2024		
Amounts in Euros	**Non-current**	**Current**	**Total**	**Non-current**	**Current**	**Total**
Bond loans	525,000,000	-	525,000,000	547,500,000	100,000,000	647,500,000
Commercial paper	50,000,000	35,000,000	85,000,000	85,000,000	35,000,000	120,000,000
Bank loans	181,130,952	12,420,635	193,551,587	78,551,587	12,420,635	90,972,222
Charges with bond issuances	(3,638,085)	-	(3,638,085)	(3,442,861)	-	(3,442,861)
Cash pooling Navigator Group	-	163,797,343	163,797,343	-	218,002,842	218,002,842
Debt securities and bank debt	**752,492,867**	**211,217,978**	**963,710,845**	**707,608,727**	**365,423,477**	**1,073,032,204**

In 2025, the trend in financing was characterised by the raising of a significant volume of new long-term facilities (with maturities ranging between 5 and 7 years), amounting to Euro 540 million (Euro 325 million in bond loans, Euro 40 million in loans and Euro 175 million in commercial paper with underwriting commitment), all indexed to ESG-linked indicators, of which facilities totalling Euro 259 million remain undrawn. A substantial portion of this financing was undertaken with the aim of extending the average maturity of the debt portfolio, with net debt increasing by only Euro 86 million, despite the significant investment effort carried out during the year and the payment of Euro 175 million in dividends.

Among these facilities, particular note should be made of the signing of a new long-term financing agreement with the European Investment Bank (EIB) in the amount of Euro 40 million, representing the first tranche of a total financing package of Euro 80 million, intended to fund a portfolio of projects aimed at accelerating Navigator's decarbonisation plan.

In the final quarter of the year, the Group entered into Euro 175 million of Sustainability-Linked commercial paper facilities, with underwriting commitment, with maturities ranging between 5 and 7 years, providing increased flexibility in the mobilisation of debt.

These new long-term facilities contributed to the extension of the Group's average debt maturity, while also supporting the maintenance of a low financing cost for the Company. The conditions of the new-long term facilities are indexed to three ESG indicators already included in the Group's Sustainability Agenda and, in turn, aligned with the Sustainable Development Goals of the United Nations.

The maturity analysis of interest-bearing liabilities is presented in the Note 8.1.3 – Liquidity risk.

Interest-bearing liabilities – Details

Amounts in Euros	Amount	Outstanding amount	Maturity	Interest rate	31/12/2025 Current	Non-current
Bond loans						
Navigator 2024-2029 SLB	50,000,000	50,000,000	June 2029	Indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator 2024-2031 SLB	50,000,000	50,000,000	June 2031	Indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator 2024-2031 SLB	50,000,000	50,000,000	October 2031	Fixed	-	50,000,000
Navigator 2024-2031 SLB	100,000,000	100,000,000	May 2031	Indexed to Euribor, with swap to fixed rate	-	100,000,000
Navigator 2025-2032 SLB	100,000,000	100,000,000	June 2032	Indexed to Euribor, with swap to fixed rate	-	100,000,000
Navigator 2025-2032 SLB	125,000,000	125,000,000	August 2032	Indexed to Euribor, with swap to fixed rate	-	125,000,000
Navigator 2025-2032 SLB	50,000,000	50,000,000	December 2032	Indexed to Euribor	-	50,000,000
Navigator 2026-2033 SLB	50,000,000	-	June 2033	-	-	-
Fees	-	(3,638,085)			-	(3,638,085)
European Investment Bank (EIB)						
EIB Loan – Cacia	6,944,444	6,944,444		Fixed	2,777,778	4,166,666
EIB Loan – Figueira	20,000,000	20,000,000	May 2028	Fixed	5,714,286	14,285,714
EIB Loan – Biomass Boiler	21,607,143	21,607,143	February 2029	Fixed	3,928,571	17,678,572
EIB Loan – Recovery Boiler	115,000,000	115,000,000	March 2031	Indexed to Euribor	-	115,000,000
EIB Loan	40,000,000	-	June 2037	Indexed to the cost of EIB funds, on disbursement	-	-
Commercial Paper Programme						
Commercial Paper Programme 175M	35,000,000	35,000,000	February 2026	Fixed	35,000,000	-
Commercial Paper Programme 65M ESG	3,250,000	-	February 2026	Indexed to Euribor	-	-
Commercial Paper Programme 75M	75,000,000	-	January 2026	Indexed to Euribor	-	-
Commercial Paper Programme 50M 2024-2030 - SL	50,000,000	50,000,000	May 2030	Indexed to Euribor	-	50,000,000
Commercial Paper Programme 50M 2025-2030 - SL	50,000,000	-	December 2030	Indexed to Euribor	-	-
Commercial Paper Programme 75M 2026-2033 - SL	75.000.000*	-	January 2033	Indexed to Euribor	-	-
Loans						
Long-term ESG loan	30,000,000	30,000,000	March 2031	Variable rate indexed to Euribor	-	30,000,000
Bank credit facilities						
Short-term facility 20M	20,450,714	-			-	-
Cash Pooling						
Navigator Group Cash Pooling Facility	163,797,343	163,797,343		-	163,797,343	-
		963,710,845			**211,217,978**	**752,492,867**

SL - Sustainability Linked

*Signature in December 2025 of a new Commercial Paper facility (SL) with a 7-year maturity, to become effective in January 2026.

31/12/2024

Amounts in Euros	Amount	Outstanding amount	Maturity	Interest rate	Current	Non-current
Bond loans						
Navigator 2022-2028 ESG	150,000,000	150,000,000	June 2028	Variable rate indexed to Euribor, with swap to fixed rate	50,000,000	100,000,000
Navigator 2019-2026	50,000,000	50,000,000	January 2026	Fixed rate	-	50,000,000
Navigator 2019-2025	10,000,000	10,000,000	March 2025	Variable rate indexed to Euribor, with swap to fixed rate	10,000,000	-
Navigator 2021-2026	12,500,000	12,500,000	April 2026	Variable rate indexed to Euribor	2,500,000	10,000,000
Navigator 2020-2026	75,000,000	75,000,000	December 2026	Variable rate indexed to Euribor, with swap to fixed rate	37,500,000	37,500,000
Navigator 2021-2026 ESG	100,000,000	100,000,000	August 2026	Variable rate indexed to Euribor, with swap to fixed rate	-	100,000,000
Navigator 2024-2029	50,000,000	50,000,000	June 2029	Variable rate indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator 2024-2031	50,000,000	50,000,000	June 2031	Variable rate indexed to Euribor, with swap to fixed rate	-	50,000,000
Navigator SLB 2024-2031	50,000,000	50,000,000	October 2031	Variable rate indexed to Euribor	-	50,000,000
Navigator 2024-2031 SLB	100,000,000	100,000,000	May 2031	Variable rate indexed to Euribor	-	100,000,000
Fees	-	(3,442,861)			-	(3,442,861)
European Investment Bank (EIB)						
EIB Loan – Cacia	9,722,222	9,722,222	May 2028	Fixed rate	2,777,778	6,944,444
EIB Loan – Figueira	25,714,286	25,714,286	February 2029	Fixed rate	5,714,286	20,000,000
EIB Loan – Biomass Boiler	25,535,714	25,535,714	March 2031	Fixed rate	3,928,571	21,607,143
EIB Loan	115,000,000	-	up to 12 years after repayment	Indexed to the cost of EIB funds, on disbursement	-	-
Commercial Paper Programme						
Commercial Paper Programme 175M	70,000,000	70,000,000	February 2026	Fixed rate	35,000,000	35,000,000
Commercial Paper Programme 65M ESG	19,500,000	-	February 2026	Variable rate indexed to Euribor	-	-
Commercial Paper Programme 75M	75,000,000	-	January 2026	Variable rate indexed to Euribor	-	-
Commercial Paper Programme 50M	50,000,000	-	December 2025	Variable rate indexed to Euribor	-	-
Commercial Paper Programme 50M 2024-2030	50,000,000	50,000,000	June 2030	Variable rate indexed to Euribor	-	50,000,000
Loans						
Long-term loan	55,000,000	30,000,000	March 2031	Variable rate indexed to Euribor	-	30,000,000
Bank credit facilities						
Short-term facility 20M	20,450,714	-			-	-
Cash Pooling						
Navigator Group Cash Pooling Facility	218,002,842	218,002,842		-	218,002,842	-
		1,073,032,204			**365,423,477**	**707,608,727**

As at 31 December 2025, the average cost of debt with financial institutions, considering interest rates, the annual fees and hedging operations, was 2.7% (as at 31 December 2024 it was 2.5%).

As at 31 December 2025, the Company had contracted Commercial Paper Programmes, contracted and undisbursed Long-term financing, as well as available and undrawn credit facilities of Euro 263,700,714 (31 December 2024: 304,950,714).

The repayment terms for the interest-bearing liabilities recorded as non-current are detailed as follows:

Amounts in Euros	31/12/2025	31/12/2024
Non-current		
1 to 2 years	12,420,635	244,920,635
2 to 3 years	23,137,009	12,420,635
3 to 4 years	68,890,977	111,031,746
4 to 5 years	66,033,835	56,785,714
More than 5 years	585,648,496	285,892,857
	756,130,952	**711,051,588**
Fees	(3,638,085)	(3,442,861)
	752,492,867	**707,608,727**

Financial covenants in force

Ratio	Definition	Loans	Limit
Interest coverage	EBITDA 12M / Annual net interest	Bank	>= 4,5 - 5,5
Indebtedness	Interest-bearing debt / EBITDA 12M	Bank	<= 4,5
Net Debt / EBITDA	(Interest-bearing debt - Cash and cash equivalents) / EBTDA 12M	Bank Commercial Paper Bonds	<= 4,0 <= 4,0 - 5,0 <= 4,0

Given the contractual limits, in 2025 and 2024 the Company is in compliance with the covenants negotiated. As at 31 December 2025 and 2024, the minimum safety margin for these covenants is, for the most part, above 80%.

Accounting policies

Interest-bearing liabilities includes Bonds, Commercial Paper, bank loans and other financing.

Initial measurement

At fair value, net of transaction costs incurred.

Subsequent measurement

At amortised cost, using the effective interest rate method.

The difference between the repayment amount and the initial measurement amount is recognised in the income statement over the debt period under Interest expenses on other loans in Note 5.10 – Net financial results.

Fair value

The book value of short-term interest-bearing liabilities or loans contracted at variable interest rates are close to their fair value.

The fair value of interest-bearing liabilities that are remunerated at a fixed rate is disclosed in Note 8.3 – Financial assets and liabilities.

Disclosure

The Company should classify a liability as current when: i) it expects to settle the liability in the normal course of its operating cycle; ii) it holds the liability primarily for trading purposes; iii) settlement of the liability is expected within twelve months of the reporting period; or iv) it does not have an unconditional right to defer settlement of the liability for at least twelve months after the reporting period.

Estimates and judgements

Commercial paper

The Company has several commercial paper programmes negotiated; agreements with which issues with contractual maturity below one year and with a revolving nature are often made. Where the Company expects to extend these loans (roll over), it classifies them as non-current liabilities.

5.7. Lease liabilities

Lease liabilities– nature

	31/12/2025			31/12/2024		
Amounts in Euros	**Non-current**	**Current**	**Total**	**Non-current**	**Current**	**Total**
Buildings	259,283	626,670	885,953	876,698	587,065	1,463,763
	259,283	**626,670**	**885,953**	**876,698**	**587,065**	**1,463,763**

Lease liabilities – movements

Amounts in Euros	31/12/2025	31/12/2024
Balance as at 1 January	1,463,763	**1,911,162**
Contract amortisation	(639,281)	(614,255)
Interest expense	34,968	50,711
Other changes	26,503	116,145
Total changes in related liabilities	**(577,810)**	**(447,399)**
Balance as at 31 December	**885,953**	**1,463,763**

Lease liabilities – future liabilities

Amounts in Euros	31/12/2025	31/12/2024
Less than 1 year	609,949	560,675
1 to 2 years	257,942	597,053
2 to 3 years	-	253,776
3 to 4 years	-	-
4 to 5 years	-	-
More than 5 years	-	-
	867,891	**1,411,504**
Interest on liabilities	18,062	52,259
Present value of liabilities	**885,953**	**1,463,763**

Accounting policies

At the start date of the lease, the Company recognises lease liabilities measured at the present value of future lease payments, which include fixed payments less lease incentives, variable lease payments, and amounts expected to be paid as residual value. Lease payments also include the price of exercise of renewal options reasonably certain to be exercised by the Company or lease termination penalty payments if the lease term reflects the Company's option to terminate the agreement.

In calculating the present value of future lease payments, the Company uses an incremental financing rate if the implied interest rate on the lease transaction is not easily determinable.

Subsequently, the value of the lease liabilities is increased by the interest amount (Note 5.10 – Net Financial Results) and decreased by the lease payments (rents).

5.8. Cash and cash equivalents

Amounts in Euros	31/12/2025	31/12/2024
Cash	3,050	3,050
Short-term bank deposits	36,085,656	5,826,041
Other short-term investments	60,000,000	252,000,000
Cash pooling (Note 10.2)	360,406,224	148,906,476
Cash and cash equivalents in the statement of financial position	**456,494,930**	**406,735,567**
Bank overdrafts - Cash pooling (Notes 5.6 and 10.2)	(163,797,343)	(218,002,842)
Cash and cash equivalents in the statement of cash flows	**292,697,587**	**188,732,725**

In 2025 and 2024, Other short-terms investments corresponds to amounts invested by Navigator in a portfolio of short-term, highly liquid deposits and issuers with adequate ratings.

As at 31 December 2025 and 2024, there are no significant balances of cash and cash equivalents that are subject to restrictions on use by the Company.

Accounting policies

Cash and cash equivalents include cash, bank accounts and other short-term investments with an initial maturity of up to 3 months, which can be mobilised immediately without any significant risk in value fluctuations.

For cash flow statement purposes, this caption will also include, when applicable, bank overdrafts, which are presented in the Statement of financial position as a current liability, under the caption Interest-bearing liabilities (Note 5.6).

5.9. Cash flows from financing activities

Movements in liabilities for financing activities

Amounts in Euros	2025	2024
Balance as at 1 January	**1,073,032,204**	**897,030,355**
Payment of interest-bearing liabilities	(444,920,636)	(103,039,683)
Receipts of interest-bearing liabilities	390,000,000	330,000,000
Cash Pooling	(54,205,499)	(50,130,358)
Changes in borrowing costs	(195,224)	(828,111)
Changes in interest-bearing debt	**(109,321,359)**	**176,001,849**
Gross interest-bearing debt	**963,710,845**	**1,073,032,204**

5.10. Net financial results

Amounts in Euros	2025	2024
Interest paid on debt securities and bank debt	(23,673,122)	(25,410,899)
Interest paid on other interest-bearing liabilities	(14,382,460)	(24,543,436)
Interest earned on other financial liabilities at amortised cost	(436,369)	(233,962)
Commissions on loans and expenses with the opening of credit facilities	(3,428,382)	(2,270,403)
Interest paid using the effective interest method	**(41,920,333)**	**(52,458,700)**
Interest paid on lease liabilities	(34,968)	(50,711)
Financial expenses related to the Company's capital structure	**(41,955,301)**	**(52,509,411)**
Unfavourable exchange rate differences	(6,692,403)	(1,678,277)
Gains / (Losses) on financial instruments - trading (Note 8.2)	1,977,198	(2,549,705)
Losses on compensatory interest	(212,897)	(279,895)
Other financial expenses and losses	(1,129,812)	(1,400,175)
Financial expenses and losses	**(48,013,715)**	**(58,417,463)**
Interest received from loans granted	22,375,276	25,978,329
Gains / (Losses) on financial instruments - hedging (Note 8.2)	3,426,873	11,328,732
Gains on compensatory interest	1,203,523	768,961
Other financial income and gains	7,358,140	6,880,183
Financial income and gains	**34,363,812**	**44,956,205**
Net financial results	**(13,649,903)**	**(13,461,258)**

Accounting policies

The Company classifies as Financial income the income and gains resulting from treasury management activities such as: i) interest obtained from the application of cash surplus; and ii) changes in the fair value in derivative financial instruments negotiated to hedge interest rate and exchange rate risk on loans, regardless of the formal designation of hedge.

6. Income tax

6.1. Income tax for the period

6.1.1. Income tax recognised in the income statement

Amounts in Euros	2025	2024
Current tax	(9,784,722)	(21,492,275)
Change in uncertain tax positions in the period	(1,806,789)	
Deferred tax (Note 6.2)	(6,158,767)	4,323,148
	(16,990,182)	**(11,911,664)**

As at 31 December 2025 and 2024, the caption Change in uncertain tax positions in the period reflects the excess/insufficiency of tax estimates, the favourable outcome of some cases related to matters with high uncertainty, as well as requests for binding information, claims to the Tax Authorities and jurisprudence of the courts.

Nominal tax rate

In the periods presented, the Company considers a nominal tax rate in Portugal of 26.5%, resulting from the tax legislation as follows:

	2025	2024
Portugal		
Nominal income tax rate	20.0%	21.0%
Municipal surcharge	1.5%	1.5%
	21.5%	**22.5%**
State surcharge - on the share of taxable profits between Euro 1,500,000 and Euro 7,500,000	3.0%	3.0%
State surcharge - on the share of taxable profits between Euro 7,500,000 and Euro 35,000,000	5.0%	5.0%
State surcharge - on the share of taxable profits above Euro 35,000,000	9.0%	9.0%

Reconciliation of the effective income tax rate for the period

Amounts in Euros	2025	2024
Profit before income tax	**161,657,617**	**298,859,859**
Expected tax at nominal rate (20%)	32,331,522	62,760,570
Municipal surcharge (2025: 0.51% ; 2024: 0.44%)	828,525	1,327,295
State surcharge (2025: 2.09% ; 2024: 2.13%)	3,376,150	6,368,769
Income tax resulting from the applicable tax rate	**36,536,197**	**70,456,634**
Nominal tax rate for the period	**22.60%**	**23.58%**
Differences (a)	(16,427,559)	(47,716,550)
Tax losses from subsidiaries	(4,866,618)	(4,451,630)
(Excess)/ Insufficiency of income tax estimate	1,806,789	(530,498)
Effect of changes in uncertain tax positions in the period	(760,096)	(4,726,965)
Tax benefits	(456,383)	(529,487)
Autonomous taxation	441,883	195,198
Tax rate difference effect	715,969	(785,038)
	16,990,182	**11,911,664**
Effective tax rate	**10.51%**	**3.99%**

(a) This amount concerns mainly:

	2025	2024
Effect of applying the equity method	(101,902,205)	(192,493,281)
Adjustments to investments in subsidiaries	24,519,722	(16,575,071)
Taxable provisions and impairment	465,014	(751,980)
Tax benefits - incentives to capitalise companies	(5,273,873)	(17,347,915)
Tax benefits - membership fees	(180,296)	(168,654)
Tax benefits - donations	(158,924)	(159,703)
Tax benefits - increase in energy costs	-	(2,059)
Tax benefits – Health insurance	(20,230)	-
Employee benefits	97,836	26,683
Other	315,160	250,311
	(82,137,796)	**(227,221,669)**
Tax effect	**(16,427,559)**	**(47,716,550)**

6.1.2. Tax recognised in the statement of financial position

Amounts in Euros	31/12/2025	31/12/2024
Assets		
Amounts pending repayment (tax proceedings decided in favour of the Company)	28,524,371	19,746,025
	28,524,371	**19,746,025**
Liabilities		
Corporate Income Tax - IRC	(8,697,441)	26,999,467
Additional tax liabilities (IRC)	15,069,703	9,207,367
	6,372,262	**36,206,834**

Detail of Corporate Income Tax - IRC (net)

Amounts in Euros	31/12/2025	31/12/2024
Income tax for the period	9,768,890	21,492,275
Payments on account, special and additional payments on account	(45,375,909)	(59,655,867)
Withholding tax recoverable	(1,983,196)	(1,808,486)
Corporate Income Tax of companies included in the RETGS	18,467,302	59,762,374
Corporate Income Tax payable / (repayable) from previous periods	10,425,472	7,209,171
	(8,697,441)	**26,999,467**

Amounts pending repayment

Amounts in Euros	31/12/2025	31/12/2024
2005 Corporate Income Tax (RETGS) - Proceeding 1259/09.BESNT	13,886,728	13,886,728
RFAI 2010 to 2012 - compensatory interest	494,856	494,856
2015-I Corporate Income Tax - Proceeding 21/22.2BALSB	3,701,107	5,364,441
2018 Corporate Income Tax (RETGS) - Proceeding CAAD 103/2024	1,457,205	-
2017 Corporate Income Tax - Proceeding CAAD 756/2023	8,984,475	-
	28,524,371	**19,746,025**

The movements in the period are detailed as follows:

Amounts in Euros	2025	2024
Balance at the beginning of the period	19,746,025	**17,510,098**
Increases	10,441,680	5,364,441
Charge-off	(1,387,340)	(3,045,969)
Reversals	-	(82,545)
Adjustments	(275,994)	-
	28,524,371	**19,746,025**

Uncertain tax positions - liabilities

Amounts in Euros	2025	2024
Balance at the beginning of the period	9,207,367	**17,073,691**
Increases	11,335,833	2,494,265
Charge-off	-	-
Transfers	(2,849,567)	(6,451,126)
Reversals	(2,623,930)	(3,909,463)
Changes in the period	5,862,336	**(7,866,324)**
	15,069,703	**9,207,367**

Taxes paid in litigation

As at 31 December 2025 and 2024, the additional tax assessments that are already paid and contested, not recognised in assets, are summarised as follows:

Amounts in Euros	31/12/2025	31/12/2024
2006 Aggregate Corporate Income Tax - Proceeding 909/11.6 BEALM	8,150,146	8,150,146
2018 Aggregate Corporate Income Tax – Proceedings 103/2023 and 648/23.5BEALM	-	8,014,795
2020 Corporate Income Tax - Proceeding 357/2025	1,523,457	-
State Surcharge 2015 II – Proceeding 453/23.9BEALM	-	6,970,541
State Surcharge 2016 – Proceeding 457/21.6BEALM	-	3,761,397
State Surcharge 2017 – Proceeding 456/21.8BEALM	8,462,724	8,462,724
State Surcharge 2019 – Proceeding 557/23.8BEALM	2,466,974	2,466,974
State Surcharge 2020 – Proceeding 26/24.9BEALM	5,183,000	5,183,000
State Surcharge 2021 – Proceeding 702/24.6BEALM	6,154,906	6,154,906
Pension Fund Contributions - Arbitration Proceeding 525/2024	-	1,457,205
	31,941,207	**50,621,688**

Accounting policies

Current income tax is calculated based on net profit, adjusted in conformity with tax legislation in force at the Statement of financial position date.

Taxation group

In Portugal, the Navigator Group is subject to the special tax regime for groups of companies (RETGS), comprising companies in which the shareholding is equal to or more than 75% and which meet the conditions laid down in articles 69 and following of the Corporate Income Tax Code (IRC Code).

These companies included in the RETGS calculate income taxes as if they were taxed independently. Liabilities are recognised as due to the controlling company of the tax business Group, currently The Navigator Company, S.A. which is responsible for the Group's overall assessment and payment of the corporate income tax. Where there are gains on the use of this regime, these are recorded as income in the controlling company's financial statements.

The amounts the Company has receivable from or payable to other companies in the tax business group in respect of their liabilities are presented under Receivables and Payables.

Estimates and judgements

The Company recognises liabilities for additional tax assessments that may result from reviews by the tax authorities of the different countries where the Company operates. When the outcome of these situations is different from the amounts initially recorded, the differences will have an impact on income tax in the period in which they occur.

In Portugal, annual income statements are subject to review and possible adjustment by the tax authorities for a period of 4 years. However, if tax losses are presented, they may be subject to review by the tax authorities for a period of 6 years. In other countries in which the Company operates, these periods are different, usually higher.

The Board of Directors considers that any corrections to those statements as a result of reviews/inspections by the tax authorities will not have a significant impact in the consolidated financial statements as at 31 December 2025, although the periods up to and including 2021 have already been reviewed.

Uncertain tax positions

The amount of assets and liabilities recorded for tax proceedings arises from an assessment made by the Company, as at the date of the consolidated statement of financial position, regarding potential differences of understanding with the Tax Authorities, considering the developments in tax matters.

The Company, in relation to the measurement of uncertain tax positions, considers the provisions of IFRIC 23 – Uncertainty over Income Tax Treatments, namely the measurement of risks and uncertainties in the definition of the best estimate of the expense required to settle the obligation, by weighing all the possible results that are controlled by them and their associated probabilities.

Pillar Two Model Rules - OECD

Navigator is subject to the OECD Pillar Two model rules from 1 January 2024. It has applied the exception to the recognition and disclosure of information on deferred tax assets and liabilities related to Pillar Two income taxes, as provided for in the amendments to IAS 12. Based on the analysis performed as at the date of this report, no significant impacts arising from the introduction of the Pillar Two regime were identified, as the majority of the jurisdictions in which the Group operates are subject to nominal tax rates above 15%, in line with the current understanding of the interpretation of the new rules.

As at the date of this report, the Company is currently assessing the impact of the introduction of the Pillar Two regime. However, given the analysis carried out so far, no significant impacts are expected, considering the current understanding of the interpretation of the new rules.

6.2. Deferred taxes

Movements in deferred taxes

Amounts in Euros	As at 1 January 2025	Effect of the Tissue Iberica Incorporation	Income Statement		Equity	As at 31 December 2025
			Increases	Decrease		
Temporary differences originating deferred tax assets						
Provisions and impairment losses taxed	2,720,023	-	492,318		-	3,212,341
Lease liabilities relating to right-of-use assets	1,463,763	-		(577,935)	-	885,828
Adjustments to investments in subsidiaries	28,325,315	693,540	212,634	(24,732,356)	-	4,499,133
	32,509,100	**693,540**	**704,952**	**(25,310,291)**	**-**	**8,597,301**
Temporary differences originating deferred tax liabilities						
Adjustments to property, plant and equipment	(140,748)	-	-	140,748	-	0
Financial instruments	(16,342,114)	-	-	-	15,935,709	(406,405)
Right-of-use assets	(1,359,258)	-		540,377	-	(818,881)
Other temporary differences			(29,438)			(29,438)
	(17,842,119)	**-**	**(29,438)**	**681,125**	**15,935,709**	**(1,254,723)**
Deferred tax assets	8,614,912	113,315	156,662	(6,457,808)	-	2,427,081
Effect of the change in tax rate	-		-	(38,949)	-	(38,949)
Deferred tax assets	**8,614,912**	**113,315**	**156,662**	**(6,496,757)**	**-**	**2,388,132**
Deferred tax liabilities	(4,728,162)		(7,360)	180,498	4,222,963	(332,061)
Effect of the change in tax rate	-		15,000	(6,810)	4,064	12,254
Deferred tax liabilities	**(4,728,162)**	**-**	**7,640**	**173,688**	**4,227,027**	**(319,807)**

Amounts in Euros	As at 1 January 2024	Adjustments	Income Statement		Equity	As at 31 December 2024
			Increases	Decreases		
Temporary differences originating deferred tax assets						
Provisions and impairment losses taxed	2,569,725	-	2,720,023	(2,569,725)	-	2,720,023
Lease liabilities relating to right-of-use assets	-	-	1,463,763	-	-	1,463,763
Adjustments to investments in subsidiaries	11,750,244	-	19,649,962	(3,074,891)	-	28,325,315
	14,319,969		**23,833,747**	**(5,644,616)**	**-**	**32,509,100**
Temporary differences originating deferred tax liabilities						
Adjustments to property, plant and equipment	(159,015)	-	-	18,267	-	(140,748)
Financial instruments	(18,072,331)	203,673	-	-	1,526,544	(16,342,114)
Right-of-use assets	-	-	(1,359,258)	-	-	(1,359,258)
	(18,231,346)	**203,673**	**(1,359,258)**	**18,267**	**1,526,544**	**(17,842,119)**
Deferred tax assets	3,937,991	-	6,554,281	(1,552,269)	-	8,940,003
Effect of the change in tax rate	-	(143,200)	(238,337)	56,446	-	(325,091)
Deferred tax assets	**3,937,991**	**(143,200)**	**6,315,943**	**(1,495,823)**	**-**	**8,614,912**
Deferred tax liabilities	(5,013,621)	234,697	(373,796)	5,023	419,800	(4,727,897)
Effect of the change in tax rate	-	1,590	13,593	(183)	(15,265)	(265)
Deferred tax liabilities	**(5,013,621)**	**236,287**	**(360,203)**	**4,841**	**404,534**	**(4,728,162)**

Law 64/2025 of 7 November amended the Corporate Income Tax Code, reducing the general corporate income tax rates. Accordingly, tax rates have been applied that reflect the rates expected to apply when the temporary differences are reversed (when the asset is realised or the liability is settled), based on tax rates (and tax laws) in force as at the reporting date. As at 31 December 2024, a rate of 26.50% was applied.

Accounting policies

Deferred tax is calculated based on the liability of the Statement of financial position on the temporary differences between the book values of the assets and liabilities and their respective tax base. To determine the deferred tax, the tax rate expected to be in force in the period in which the temporary differences will be reversed is used.

Deferred tax assets are recognised whenever there is a reasonable likelihood that future taxable profits will be generated against which they can be offset. Deferred tax assets are revised periodically and decreased, whenever it is likely that tax losses will not be used.

Deferred taxes are recorded as an income or expense for the year, except where they result from amounts recorded directly under equity, situation in which deferred tax is also recorded under the same caption. Tax benefits attributed to the Company regarding its investment projects are recognised through the income statement as there is sufficient taxable income to allow its use.

7. Payroll

7.1. Payroll costs

Amounts in Euros	2025	2024
Remuneration of Corporate Bodies - fixed (Note 7.3)	999,025	911,838
Remuneration of Corporate Bodies - variable	1,414,453	530,405
Employee remuneration	3,864,925	2,710,766
Social Security contributions	1,055,819	813,347
Post-employment benefits (Note 7.2.2)	211,431	117,473
Other payroll costs	2,703,843	510,005
Payroll costs	**10,249,496**	**5,593,834**

The increase is primarily due to the rise in the Remuneration of Corporate Bodies and the merger of Navigator Tissue Ibérica into the Spanish branch.

Number of employees at the end of the period

As at 31 December 2025 and 2024, the number of employees under contract with the Company stood at 295 (of which 6 were employed at the Spanish branch) and 309, respectively, of whom 274 were employed by other Group companies (2024: 295). The company employed—via multiple employment contracts—32 employees (2024: 33).

Accounting policies

Short-term employee benefits

Acquired rights - holidays and holiday allowance

In accordance with the applicable company agreement of The Navigator Company, S.A., employees are entitled to 25 working days of annual leave, as well as to one month of holiday pay, accrued in the year preceding that of its payment.

Moreover, employees who work continuous shifts for more than 25 or 30 years get one or two additional days' holiday, respectively.

Bonuses

According to the current Performance Management System (*Sistema de Gestão de Desempenho*), employees have the right to a bonus, based on annually defined objectives. The entitlement of this bonus is usually acquired in the year preceding its payment.

These liabilities are recorded in the year in which the Employees acquire the respective right, irrespective of the date of payment, whilst the balance payable at the date of the Statement of financial position is shown under the caption Payables (Note 4.3).

Benefits arising from termination of employment

The benefits arising from termination of employment are recognised when the Company can no longer withdraw the offer of such benefits or in which the Company recognises the cost of restructuring under the provisions recording. Benefits due more than 12 months after the end of the reporting period are discounted to their present value.

7.2. Employee benefits

7.2.1. Defined benefit plan

Policy for managing the risk associated with defined benefit plans

For capital management purposes, the Company defines capital as including equity and net debt.

The Company's exposure to risk is limited to the number of existing beneficiaries and will tend to decrease, since there are no defined benefit plans open to new employees in the Company.

The most significant risks to which the Company is exposed through defined benefit plans include:

i) Risk of change in the longevity of participants.

ii) Market rate variation risk – rate variation impacts the rate used to discount liabilities (technical interest rate) which is based on yield curves of highly rated bonds with maturities similar to the liabilities' expiry dates and the fixed rate of return of the assets. The Company uses yield curves in order to monitor the evolution of rates and performs sensitivity analyses of interest rate variations with the aim of foreseeing and preventing the consequent impact on the fund's funding level.

iii) Risk of change in the wage and pension growth rate.

iv) Return on the fund's financial assets – the Company closely monitors the evolution of the fund's assets, as well as the evolution of the main financial market indicators, revisiting the investment policy approved for the management of the assets whenever justifiable, and at least every three years. The investment policy is aligned with a conservative view of asset management and defined on the basis of the responsibilities to be financed by the fund.

Net liabilities

Net liabilities reflected in the Statement of financial position and the number of beneficiaries of the defined benefit plans in force in the Company are detailed as follows:

	31/12/2025		31/12/2024	
	No. of Beneficiaries	**Amount**	**No. of Beneficiaries**	**Amount**
Past service liabilities				
Active employees, including individual accounts	14	894,357	14	927,214
Alumni			-	-
Retired employees	124	11,759,984	128	12,172,444
Market value of pension funds		(12,086,071)		(12,690,722)
Total net liabilities	**138**	**568,270**	**142**	**408,936**

It is the Navigator Group’s intention to use the surplus funding identified in the defined benefit plans to finance any future increases in liabilities.

Historical information – last five years

Amounts in Euros	2021	2022	2024	2025
Present value of liabilities	16,354,196	13,760,556	13,099,658	12,654,341
Fair value of assets and Reserve account	16,798,826	13,360,257	12,690,722	12,086,071
Surplus / (deficit)	**444,630**	**(400,299)**	**(408,936)**	**(568,270)**

Evolution of defined benefit plan liabilities

2025	Opening balance	Current service cost	Interest expense	Actuarial deviations	Payments performed	Closing balance
Amounts in Euros						
Pensions with autonomous Fund	13,099,658	21,343	438,211	316,373	(1,221,253)	12,654,332
	13,099,658	**21,343**	**438,211**	**316,373**	**(1,221,253)**	**12,654,332**

2024	Opening balance	Current service cost	Interest expense	Actuarial deviations	Payments performed	Closing balance
Amounts in Euros						
Pensions with autonomous Fund	13,324,113	20,101	444,522	538,376	(1,227,454)	13,099,658
	13,324,113	**20,101**	**444,522**	**538,376**	**(1,227,454)**	**13,099,658**

The average expected duration of the defined benefit liabilities is 12.4 years (2024: 12.5 years).

Funds

Funds allocated to the defined benefit pension plans – evolution

Amounts in Euros	2025	2024
Opening balance	12,690,722	**13,156,177**
Expected income for the period	361,729	437,941
Remeasurement	254,873	324,058
Pensions paid	(1,221,253)	(1,227,454)
Closing balance	**12,086,071**	**12,690,722**

Funds allocated to defined benefit plan - estimated contributions in the following period

The contributions planned for the next annual reporting period are, among other factors, dependent on the profitability of the funds' assets.

Funds allocated to defined benefit plans - composition of assets

Amounts in Euros	31/12/2025	%	31/12/2024	%
Securities listed in the market				
Bonds	7,390,709	61.16%	7,769,834	61.2%
Shares	3,094,593	25.60%	3,221,083	25.4%
Public debt	1,156,717	9.57%	1,189,802	9.4%
Liquidity	94,646	0.78%	128,779	1.0%
Other short-term investments	349,406	2.89%	381,224	3.0%
	12,086,071	100.00%	**12,690,722**	**100.00%**

The assets of the pension fund do not include any assets of the Company.

7.2.2. Expenses incurred with post-employment benefit plans

Amounts in Euros	2025 Current service cost	2025 Net interest	2025 Defined contribution - Contributions for the period	2025 Impact on net profit (Note 7.1)	2024 Current service cost	2024 Net interest	2024 Defined contribution - Contributions for the period	2024 Impact on net profit (Note 7.1)
Pensions with Autonomous Fund	21,343	76,493	-	97,836	20,101	6,582	-	26,683
Defined-contribution plans	-	-	113,595	113,595	-	-	90,790	90,790
	21,343	**76,493**	**113,595**	**211,431**	**20,101**	**6,582**	**90,790**	**117,473**

As at 31 December 2025, the Defined Contribution plans covered 324 participants (2024: 345 participants).

Accounting policies

Post-employment benefits - defined benefit plan

The Company has assumed the commitment to make payments to their employees in the form of complementary retirement pensions, disability, early retirement and survivors' pensions, having constituted defined-benefit plans.

The Company set up autonomous pension funds as a means of funding most of the liabilities. Based on the projected credit unit method, the Company recognises the costs with the attribution of these benefits as the services are provided by the employees. The total liability is estimated separately for each plan at least once every six months, on the date of closing of the interim and annual accounts, by a specialised and independent entity.

The liability thus determined is presented in the Statement of financial position, less the fair value of the funds set up, under Pensions and other post-employment benefits.

Actuarial deviations resulting from changes in the value of estimated liabilities, as a consequence of changes in the financial and demographic assumptions used and experience gains, added to the differential between the actual return on fund assets and the estimated share of net interest, are designated as remeasurements and recorded directly in the statement of comprehensive income, under retained earnings.

Net interest corresponds to the application of the discount rate to the value of net liabilities (value of liabilities less the fair value of fund assets) and is recognised in the income statement for the period under Payroll costs (Note 7.1).

The gains and losses generated by a curtailment or settlement of a defined-benefit plan are recognised in the income statement for the period when the curtailment or settlement occurs. A curtailment occurs when there is a material reduction in the number of employees.

Costs for past liabilities resulting from the implementation of a new plan or increases in benefits attributed are recognised immediately in profit or loss for the period.

Post-employment benefits - defined contribution plan

The Company assumed commitments regarding payments to a defined contribution plan in a percentage of the employees' salary, in order to provide retirement, disability, early retirement and survivors' pensions.

To this end, Pension Funds have been set up to capitalise on those contributions, for which employees may still make voluntary contributions, but for which the Company does not assume any additional contribution responsibilities or a pre-fixed return. Thus, the contributions made are recorded as expenses of the period in which they are recognised, regardless of the time of their settlement.

Estimates and judgements

Actuarial assumptions

	31-12-2025	31-12-2024
Social Security Benefits Formula	Decree Law 187/2007 of 10 May	
Disability table	EKV 80	EKV 80
Mortality table	TV 88/90-1	TV 88-90
Technical interest rate	4.22%)	3.50%
Wage growth rate	2.00%	2.00%
Return rate on plan assets	3.50%	3.50%
Pensions growth rate	2.00%)	2.00%

Sensitivity analysis

Amounts in Euros	31-12-2025	31-12-2024
0.5% decrease in the discount rate		
Increase in liabilities assumed	509,194	552,335
0.5% increase in the discount rate		
Decrease in liabilities assumed	(473,429)	(506,556)
0.5% decrease in the wage growth rate		
Decrease in liabilities assumed	(78,055)	(24,586)
0.5% increase in the wage growth rate		
Increase in liabilities assumed	48,612	29,373
0.5% decrease in the pensions growth rate		
Decrease in liabilities assumed	(416,531)	(440,120)
0.5% increase in the pensions growth rate		
Increase in liabilities assumed	440,451	472,016

7.3. Remuneration of Corporate Bodies

Amounts in Euros	2025	2024
Navigator Corporate Bodies		
Board of Directors	869,145	757,338
Supervisory Board	73,680	75,500
Environment Board	50,200	73,000
Board of the General Shareholders Meeting	6,000	6,000
	999,025	**911,838**

Remuneration of the members of the Board of Directors

Full details of the remuneration policy for the members of Navigator's Board of Directors are described in the Company's Corporate Governance Report.

Three of the current directors are members of pension plans of Navigator Brands, S.A., a subsidiary of the Company, as Employees of that company, before joining management positions.

As at 31 December 2025 and 2024, regarding the members of the Board of Directors of Navigator, there were no: i) any additional liabilities allocated to other long-term benefits, ii) employment termination benefits, iii) share-based payments and iv) any outstanding balances.

8. Financial instruments

8.1. Financial risk management

The Company, at the level of the Navigator Group, has a risk-management programme, which focuses its analysis on the financial markets with a view to mitigate the potential adverse effects on its financial performance. Risk management is undertaken by the Group's Financial Management in accordance with the policies approved by the Board of Directors and monitored by the Risks and Control Commission.

The Company adopts a proactive approach to risk management, as a way to mitigate the potential adverse effects associated with those risks, namely the exchange rate risk and interest rate risk.

8.1.1. Exchange rate risk

Exchange rate risk management policy

A significant part of the Company’s sales is priced in currencies other than the Euro; therefore, its evolution can have a significant impact on the cash flows obtained from the Company's future sales, with the currency with the greatest impact being the USD. Also, sales in GBP, PLN, CHF and ZAR have some weight, having sales in other currencies less expression.

Purchases of some raw materials are also made in USD, namely part of wood and long-fibre pulp imports of wood and acquisitions of long-fibre pulp. Therefore, changes in USD may have an impact on acquisition values.

Moreover, once a sale or purchase is made in a currency other than the Euro, the Company becomes exposed to exchange rate risk until the receipt or payment of such sale or purchase, if no hedging instruments are in place. As a result, there is a significant number of receivables and payables, the latter with lesser expression, exposed to exchange rate risk.

The Company has foreign subsidiaries that expose it to exchange rate risk, namely Navigator North America in the United States, Navigator Paper Company UK, Ltd. and Portucel Moçambique. Besides those operations, the Company does not hold materially relevant investments in foreign operations, the net assets of which are exposed to exchange rate risk.

Use of derivative financial instruments

The Company manages exchange rate risk by using derivative financial instruments, in accordance with a policy that is subject to periodic review and whose purpose is to limit the exchange rate risk associated with future sales and purchases, receivables and payables, as well as other assets expressed in currencies other than the Euro.

In the periods presented, the Company holds derivatives that are hedging the exchange rate risk of future operations in currencies other than the presentation currency (see Note 8.2 - Derivative financial instruments).

Exposure of financial assets and liabilities to exchange rate risk and sensitivity analysis

31 December 2025	US dollar	Sterling pound	Polish zloty	South African rand	Swiss franc	Total (Euro)
Amounts in foreign currency						
Cash and cash equivalents	995,834	526,213	1,893,073	10,362,132	1,844	2,433,952
Receivables	64,806,693	191,233,932	6,266,535	91,743,498	25,067	275,820,328
Total financial assets	**65,802,527**	**191,760,145**	**8,159,608**	**102,105,630**	**26,911**	**278,254,280**
Payables	(10,265,734)	(16,149,315)	(523,777)	4,623,523	(445,147)	(27,845,939)
Total financial liabilities	**(10,265,734)**	**(16,149,315)**	**(523,777)**	**4,623,523**	**(445,147)**	**(27,845,939)**
Net financial position in foreign currency	55,536,793	175,610,830	7,635,831	106,729,153	(418,236)	250,408,341
Net financial position in Euro	47,265,356	201,250,092	1,809,010	5,489,082	(449,040)	255,364,500
Impact of a +10% change in all exchange rates on profit or loss for the period						**18,258,797**
Impact of a -10% change in all exchange rates on profit or loss for the period						**(28,373,832)**

31 December 2024	US dollar	Sterling pound	Polish zloty	South African rand	Swiss franc	Total (Euro)
Amounts in foreign currency						
Cash and cash equivalents	291,472	3,892	33,392	1,038	1,828	295,058
Receivables	115,310,769	19,818,964	9,733,718	-	1,846,939	139,134,237
Total financial assets	**115,602,241**	**19,822,856**	**9,767,110**	**1,038**	**1,848,767**	**139,429,295**
Payables	(2,534,382)	(241,959)	-	-	(75,875)	(2,811,906)
Total financial liabilities	**(2,534,382)**	**(241,959)**	**-**	**-**	**(75,875)**	**(2,811,906)**
Net financial position in foreign currency	**113,067,859**	**19,580,897**	**9,767,110**	**1,038**	**1,772,892**	**136,617,389**
Net financial position in Euro	**108,834,208**	**23,614,772**	**2,284,704**	**53**	**1,883,651**	**136,617,389**
Impact of a +10% change in all exchange rates on profit or loss for the period						**12,419,763**
Impact of a -10% change in all exchange rates on profit or loss for the period						**(15,179,709)**

In this Note, the Company discloses the exposure of financial assets and liabilities to exchange rate risk, as well as the respective sensitivity analysis. There are currencies in which the Company has carried out transactions but in which, at the balance sheet date, it does not have relevant foreign exchange exposures, which is why the exchange rates disclosed in Note 1.3.3 are more numerous than the currencies presented in this note.

8.1.2. Interest rate risk

Interest rate risk management policy

A significant share of the Company's financial liabilities cost is indexed to short-term reference interest rates, which are reviewed more than once a year (generally every six months for medium and long-term debt). Hence, changes in interest rates can have an impact on the Company's income statement.

The strategy for interest rate risk management is reviewed annually by the Company, and currently the Company maintains the majority of its debt traded at fixed rate.

Use of derivative financial instruments

When deemed appropriate by the Board, the Company uses derivative financial instruments (Note 8.2), namely swaps, with the purpose of fixing the interest rate on loans obtained, within certain parameters, deemed appropriate by the Company's risk management policies.

Exposure to interest rate risk

As at 31 December 2025, approximately 30% (31 December 2024: 11%) of the Navigator Group's financial liabilities are indexed to short-term reference interest rates, revised in periods below one year (usually 6-month rates for long-term debt), plus duly negotiated risk spreads.

The following table sets out the assets and liabilities exposed to interest rate risk. This information therefore excludes assets and liabilities whose interest rate risk is fully hedged by derivative financial instruments with a maturity and/or reset date identical to that of the underlying asset.

As at 31 December 2025 and 2024, the detail of the financial assets and liabilities with interest rate exposure, considering the maturity or the next interest-fixing date is as follows:

Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Total
31 December 2025						
Assets						
Current						
Cash and cash equivalents	456,494,930	-	-	-	-	456,494,930
Total financial assets	**456,494,930**	**-**	**-**	**-**	**-**	**456,494,930**
Liabilities						
Non-current						
Interest-bearing liabilities	-	-	-	86,315,789	158,684,211	245,000,000
Current						-
Interest-bearing liabilities	163,797,343	-	-	-	-	163,797,343
Total financial liabilities	**163,797,343**	**-**	**-**	**86,315,789**	**158,684,211**	**408,797,343**
Cumulative difference	**292,697,587**	**292,697,587**	**292,697,587**	**206,381,798**	**47,697,587**	

Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Total
31 December 2024						
Assets						
Current						
Cash and cash equivalents	406,735,567	-	-	-	-	406,735,567
Total financial assets	**406,735,567**	**-**	**-**	**-**	**-**	**406,735,567**
Liabilities						
Non-current						
Interest-bearing liabilities	-	-	-	10,000,000	80,000,000	90,000,000
Current						-
Interest-bearing liabilities	218,002,842	-	-	-	-	218,002,842
Total financial liabilities	**218,002,842**	**-**	**-**	**10,000,000**	**80,000,000**	**308,002,842**
Cumulative difference	**188,732,725**	**188,732,725**	**188,732,725**	**178,732,725**	**98,732,725**	

Estimates and judgements

Sensitivity analysis

Navigator uses the sensibility analysis technique to measure impacts on the income statement and equity of increase or decrease on interest rates maintaining the other variables constant. This is an illustrative analysis only, since changes in market rates rarely occur separately.

The sensitivity analysis is based on the following assumptions:

i. Changes in market interest rates affect interest income and expenses arising from variable financial instruments;

ii. Changes in market interest rates affect the fair value of derivative financial instruments as well as other financial assets or liabilities;

iii. Changes in fair value of derivative financial instruments and other financial assets and liabilities are measured using the discounted cash flows method, with market interest rates at year end.

A 0.50% increase in interest rates on which interest on loans are calculated would have an impact on profit before taxes, for the period ended 31 December 2025 by approximately Euro 2,043,987 (31 December 2024: Euro 462,500).

8.1.3. Liquidity risk

Liquidity risk management policy

The Company manages the liquidity risk in two ways:

i. ensuring that its financial debt has a high medium- and long-term component with maturities appropriate to the characteristics of the industries where it operates, and

ii. by contracting with financial institutions credit facilities available at all times for an amount that guarantees adequate liquidity.

Available but not used credits

The Company's policy is to maintain credit facilities at adequate levels to, together with the amount of Cash and Cash Equivalents in order to guarantee, with some comfort margin, the cash cycle expected for the next 12 months.

Contractual maturity of financial liabilities (undiscounted flows, including interest)

	31 December 2025					
Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Total
Liabilities						
Interest-bearing liabilities						
Bond loans	-	1,663,986	13,119,360	107,898,425	490,618,581	613,300,352
Commercial paper	-	35,254,022	1,515,534	54,808,685	-	91,578,241
Bank loans	-	5,589,584	11,935,021	87,793,920	119,496,660	224,815,185
Derivative financial instruments	-	-	-	-	-	-
Total liabilities	**-**	**42,507,592**	**26,569,915**	**250,501,030**	**610,115,241**	**929,693,778**
Of which interest (at rates prevailing at that date)						**126,142,191**

	31 December 2024					
Amounts in Euros	Up to 1 month	1-3 months	3-12 months	1-5 years	More than 5 years	Total
Liabilities						
Interest-bearing liabilities						
Bond loans	420,000	10,521,500	99,941,464	392,316,564	210,017,643	713,217,171
Commercial paper	-	35,497,000	248,500	35,248,500	50,000,000	120,994,000
Bank loans	-	4,969,536	9,377,303	48,971,139	37,668,335	100,986,313
Derivative financial instruments	-	1,259,512	2,879,804	2,659,143	(783,753)	6,014,704
Total liabilities	**420,000**	**52,247,548**	**112,447,071**	**479,195,346**	**296,902,225**	**941,212,188**
Of which interest (at rates prevailing at that date)						**76,725,262**

The table considers the debt issued and the long-term debt contracted and not disbursed that will refinance the debt maturing in 2025 (Available and undrawn credit facilities).

The contractual maturity of the interest-bearing liabilities presupposes the fulfilment of financial covenants, as detailed in Note 5.6 – Interest-bearing liabilities.

Available and undrawn credit facilities

Amounts in Euros	31/12/2025	31/12/2024
Undrawn credit facilities		
Commercial paper (with long-term underwriting)	128,250,000	144,500,000
EIB loans	40,000,000	115,000,000
Other credit facilities	70,450,714	45,450,714
	238,700,714	**304,950,714**
Commercial paper used (Note 5.6)	85,000,000	120,000,000
Other credit facilities used	718,551,587	738,472,222
Contracted credit facilities (nominal amount)	**1,042,252,301**	**1,163,422,936**

8.1.4. Credit risk

Credit risk management policy

The Company is exposed to credit risk on balances receivable from Trade and other receivables and has adopted a policy of managing risk coverage within certain levels through credit insurance with a specialised independent company.

Most sales that are not covered by credit insurance are covered by bank guarantees and documentary credits, and any exposure that is not covered remains within the limits previously approved by the Executive Committee.

However, the worsening of global economic conditions or adversities affecting only economies on a local scale may lead to deterioration in the ability of the Company's Customers to settle their liabilities, leading entities providing credit insurance to significantly decrease the amount of credit facilities that are available to those Customers. This scenario may result in limitations on the amounts that can be sold to some customers without directly incurring credit risk levels that are not compatible with the risk policy in this area.

Cash equivalents

The Company adopts strict policies in approving its financial counterparties, limiting its exposure in accordance with an individual risk analysis and within previously approved limits.

Maximum exposure to credit risk

The Company's maximum exposure to the credit risk of financial assets corresponds to their net amount, as follows:

Amounts in Euros	31/12/2025	31/12/2024
Non-current		
Receivables (Note 4.2)	6,684	6,684
Current		
Receivables (Note 4.2)	968,978,969	1,033,579,502
Cash and cash equivalents (Note 5.8)	456,494,930	406,735,567
	1,425,480,583	**1,440,321,753**

Ageing structure of Trade receivables balances

As at 31 December 2025 and 2024, Trade receivables balances presented the following ageing structure, considering as reference the maturity date of the outstanding amounts before impairments:

Amounts in Euros	31/12/2025	31/12/2024
Outstanding amounts	231,730,891	192,391,500
1 to 90 days	13,721,923	24,267,673
91 to 180 days	120,044	59,623
181 to 360 days	283,581	6,609
361 to 540 days	18,094	2,125
541 to 720 days	60,037	669
more than 721 days	-	-
	245,934,570	**216,728,199**
Balances considered impaired	2,633,740	1,975,527
Impairment	(2,633,740)	(1,975,527)
Net balance of trade receivables (Note 4.2)	**245,934,570**	**216,728,199**

Trade receivables covered by credit insurance	209,724,170	178,533,257
Trade receivables covered by bank guarantees	2,000,000	2,000,000
Trade receivables covered by title retention agreements	2,389,173	1,873,390
Trade receivables covered by letters of credit / documentary remittances	24,239,144	33,593,182
Covered receivables	**238,352,487**	**215,999,829**
Available and undrawn credit facilities	393,255,519	417,439,401
Credit hedging facilities contracted	**631,608,006**	**633,439,230**

The amounts shown above correspond to the amounts outstanding according to the contracted due dates.

Despite some delays in the settlement of those amounts, that does not result, in accordance with the available information, in the identification of impairment losses other than the ones considered through the respective losses. These are calculated based on the information periodically collected on the financial behaviour of the Company's Customers, which allow, in conjunction with the experience obtained in the client portfolio analysis and with the history of credit defaults, in the part not attributable to the insurance company, to define the amount of losses to be recognised in the period. The guarantees in place for a significant part of outstanding and long-term balances, justify the fact that no impairment loss has been recorded for those balances. The rules defined by the credit risk insurance policy applied by the Company, ensure a significant hedge of all outstanding balances.

Movements in impairment losses in Trade receivables

Amounts in Euros	2025	2024
Accumulated impairment at the beginning of the period	**(1,975,527)**	**(2,593,323)**
Changes due to:		
Amounts recognised in the income statement	(18,013)	(757,265)
Reversal of unused amounts	167,276	1,378,213
Impact of IFRS 9	(356,382)	-
Changes recognised in the income statement	**(207,119)**	**620,948**
Derecognition of uncollectible assets	10,035	-
Effect of the Tissue Iberica incorporation	(461,129)	-
Exchange rate adjustment	-	(3,152)
Accumulated impairment at the end of the period	**(2,633,740)**	**(1,975,527)**

Accounting policies

Impairment of debt instruments

The Company assesses, on a prospective basis, the expected credit losses associated with its financial assets measured at amortised cost and at fair value through other comprehensive income, in accordance with IFRS 9.

On this basis, Navigator recognises expected credit losses throughout the lifetime of financial instruments that have been subject to significant increases in credit risk since its initial recognition, assessed either individually or collectively, considering all reasonable and sustainable information, including available prospective information.

If, at the reporting date, the credit risk associated with a financial instrument has not increased significantly since its initial recognition, the Company measures the impairment of that financial instrument by an amount equivalent to the expected credit losses.

IFRS 9 provides that for the calculation of these impairments, one of two models is used: the 3-step method or the use of a matrix, the distinguishing component being the existence or not of a significant financing component. For Navigator's financial assets, since it is not a financial institution and there are no assets that have a significant financing component, the use of a matrix was chosen.

The model adopted for the impairment assessment in accordance with IFRS 9 is as follows:

i. Calculate the total credit sales made by the Group over the last 12 months, as well as the total amount of bad debts relating to them;

ii. Determine the Customers' payment profile, by setting buckets of receipt frequency;

iii. Based on I. and II. above, estimate the probability of default (*i.e.*, the amount of bad debts calculated at I. compared to the balance of outstanding sales in each bucket calculated at II);

iv. Adjust the percentages of future forecasts obtained in III.;

v. Apply the default percentages as calculated in IV. to the balances of customers still outstanding at the reporting date.

Although IFRS 9 assumes 90 days as "default", Navigator considered a period of 180 days, since the experience of real losses before this period is low. This period is aligned with the current risk management policies of the company, namely in what regards the credit insurance hired, and to the fact that there is no sales with significant components of funding in light of IFRS 15. Additionally, the company evaluated the

impact of considering 180 days of "default" instead of the 90 days and the Expected Credit Loss would not change significantly.

In the event of an accident in the credit insurance company, the model considers the limit paid, by Navigator, of 10% for national Customers and 5% for international Customers.

In addition, the Company recognises impairment on a case-by-case basis, based on specific balances and specific past events, considering the historical information of the counterparties, their risk profile and other observable data in order to assess whether there are objective indicators of impairment for these financial assets. The Company uses the write-off procedure only when the credit is considered to be definitely uncollectible by a court decision.

8.2. Derivative financial instruments

Movements in derivative financial instruments

	2025			2024		
Amounts in Euros	Trading derivatives	Hedging derivatives	Net total	Trading derivatives	Hedging derivatives	Net total
Balance at the beginning of the period	**(1,631,312)**	**16,342,114**	**14,710,803**	**(4,068,868)**	**17,835,989**	**13,767,121**
New contracts / settlements	-	(3,426,873)	(3,426,873)	4,987,261	(11,296,063)	(6,308,801)
Change in fair value through profit or loss (Note 5.10)	1,977,198	3,426,873	5,404,071	(2,549,705)	11,328,732	8,779,027
Change in fair value of other comprehensive income (Note 5.5)	-	(15,935,709)	(15,935,709)	-	(1,526,544)	(1,526,544)
Balance at the end of the period	**345,886**	**406,405**	**752,292**	**(1,631,312)**	**16,342,114**	**14,710,803**

Hedging derivative contracts entered into for pulp and paper sales had a negative impact of Euro 5,714,356 on sales margin. (2024: positive impact of Euro 1,973,497).

8.2.1. Detail and maturity of derivative financial instruments by nature

31 December 2025

Amounts in Euros	Notional	Currency	Maturity	Positive (Note 4.2)	Negative (Note 4.3)	Net amount
Hedging						
Future sales	163,200,000	USD	2026 / 2028	95,723	(563,525)	(467,802)
Future sales	190,140,000	GBP	2,026	165,859	(241,641)	(75,782)
Long-term foreign exchange hedging	16,060,421	USD	2,028	-	(15,449)	(15,449)
Hedging in subsidiaries	4,668,772	USD	2,026	58,203	-	58,203
Interest rate swaps - Bonds	425,000,000	EUR	2,032	7,485,306	(1,517,038)	5,968,268
Energy	24,653,150	EUR	2,027	549,492	(5,610,525)	(5,061,033)
				8,354,583	**(7,948,178)**	**406,405**
Trading						
Foreign exchange forwards	62,800,000	USD	2,026	387,827	-	387,827
Foreign exchange forwards	18,200,000	GBP	2,026	-	(41,941)	(41,941)
				387,827	**(41,941)**	**345,886**
				8,742,410	**(7,990,119)**	**752,291**

31 December 2024

Amounts in Euros	Notional	Currency	Maturity	Positive (Note 4.2)	Negative (Note 4.3)	Net amount
Hedging						
Future sales	272,000,000	USD	2025	-	(1,103,142)	(1,103,142)
Future sales	130,000,000	GBP	2025	-	(262,405)	(262,405)
Interest rate swaps - Bonds	535,000,000	EUR	2031	8,383,516	(3,314,640)	5,068,875
Energy	24,653,150	EUR	2025	12,638,786		12,638,786
				21,022,302	**(4,680,188)**	**16,342,114**
Trading						
Foreign exchange forwards	60,500,000	USD	2025	-	(1,597,132)	(1,597,132)
Foreign exchange forwards	40,900,000	GBP	2025	-	(34,179)	(34,179)
				-	**(1,631,312)**	**(1,631,312)**
				21,022,302	**(6,311,499)**	**14,710,803**

Cash flow hedge | Exchange rate risk EUR/USD and EUR/GBP

During the first half of 2025, the Group concluded the Zero Cost Collar contracting of the derivative financial instruments initiated in the last quarter of 2024, thus guaranteeing full hedging of the estimated exposure of its foreign currency sales in 2025, amounting to USD 272,000,000 and GBP 210,000,000. During the third quarter, the Group initiated the contracting of hedges corresponding to the forecast exposure of foreign currency sales for 2026, having secured, during the period, hedges covering USD 149,600,000 and GBP 190,140,000 of the total exposure to be hedged.

Interest rate hedge

During the first quarter of 2025, a swap with a notional value of Euro 10,000,000 associated with financing contracted for the period 2019-2025 matured and was settled during that period. In the third quarter of 2025, the Group contracted two swaps of Euro 62,500,000 each to fix the interest rate associated with the Navigator 2025-2032 SLB bond loan, in the amount of Euro 125,000,000, both starting in August 2025. During the third quarter of 2025, the Group settled four interest rate swaps with a total notional amount of Euro 175,000,000 due to the early redemption of two bond issues maturing in 2026, generating a cash inflow of Euro 3,984,173.

Energy Hedging

Given the Group's exposure to price risk in the procurement of electricity and natural gas, during 2025 the price hedging strategy initiated in the course of 2024 was strengthened through the contracting of swaps to fix prices, covering approximate volumes of 558,101 MWh for electricity and 1,121,163 MWh for natural gas. Additionally, for 2026, swaps were contracted to fix electricity prices for a volume of 319,211 MWh and natural gas prices for a volume of 1,206,488 MWh. For 2027, swaps were likewise contracted to fix electricity prices, corresponding to 194,160 MWh.

Estimates and judgements

Fair value of derivative financial instruments

Whenever possible, the fair value of derivatives is estimated on the basis of quoted instruments. In the absence of market prices, the fair value of derivatives is estimated through the discounted cash-flow method and option valuation models, in accordance with prevailing market assumptions.

Accounting policies

The fair value of derivative financial instruments is included under Payables (Note 4.3), when negative, and under Receivables (Note 4.2), when positive.

In accordance with IFRS 9 - Financial Instruments, the Group has opted to continue applying the hedge accounting requirements of IAS 39 - Financial Instruments, until there is greater visibility on the Dynamic Risk Management (macro hedging) project currently in progress.

Whenever expectations of changes in interest or exchange rates so justify, the Group hedges these risks through derivative financial instruments, such as interest rate swaps (IRS), interest rate and foreign exchange collars, forwards, etc.

Trading derivative financial instruments

Although the derivatives contracted by the Company represent effective economic hedges of risks, not all of them qualify as hedging instruments in accounting terms to satisfy the applicable rules and requirements. Instruments that do not qualify as hedging instruments are recorded in the Separate statement of financial position at their fair value and changes in fair value are recognised in Net financial results (Note 5.10), when related to financing operations, or in External services and supplies (Note 2.3) or Revenue (Note 2.1), when referring to hedging of sales receivable flows in a currency other than the presentation currency.

Hedging derivative financial instruments

Derivative financial instruments used for hedging purposes may be recognised as hedging instruments provided that they comply, cumulatively, with the conditions set out in IAS 39.

Cash flow hedging (interest rate, exchange rate and commodity risk - BHKP)

In order to manage its exposure to interest rate risk and exchange rate risk, the Company enters into cash flow hedges.

Those transactions are recorded in the Interim consolidated statement of financial position at their fair value, if considered effective hedges. The effective portion of changes in the fair value of derivatives that are designated and qualify as cash flow hedges is recognised in other comprehensive income. The gain or loss relating to the ineffective portion is recognised immediately in the income statement.

Accumulated amounts in equity are reclassified to profit or loss in the periods when the hedged item affects the Income statement (for example, when the forecast sale that is hedged takes place). The gain or loss relating to the effective portion of interest rate swaps hedging variable rate borrowings is recognised in the income statement under Net financial results (Note 5.10). However, when the forecast transaction that is hedged results in the recognition of a non-financial asset (for example, inventory or property, plant and equipment), the gains and losses previously deferred in equity are transferred from equity and included in the initial measurement of the cost of the asset.

When a hedging instrument expires or is sold, or when a hedge no longer meets the criteria for hedge accounting, any cumulative gain or loss existing in equity is recycled to the income statement, unless the hedged item is a forecast transaction, in which case any cumulative gain or loss existing in equity at that time remains in equity and is recognised when the forecast transaction is ultimately recognised in the income statement.

Derivative financial instruments used by Navigator Group

Foreign exchange trading derivatives

The Navigator Group has a currency exposure on sales invoiced in foreign currencies, namely US dollars (USD) and pounds sterling (GBP). As the Group's financial statements are presented in Euro, it is exposed to an economic risk on the conversion of these currency flows to the Euro. The Group is also required, albeit to a lesser degree, to make certain payments in those same currencies which, for currency exposure purposes, act as a natural hedge. Thus, the hedge is aimed at safeguarding the net value of items in the statement of financial position denominated in a currency other than the presentation currency against the respective currency fluctuations.

The hedging instruments used in this operation are foreign exchange forward contracts covering the net exposure to currencies other than the presentation currency, for amounts and due dates close to that exposure. The nature of the risk hedged is the change in the book value on sales and purchases expressed in currencies other than the presentation currency. At the end of each month, the balances of Trade receivables and Trade payables expressed in foreign currency are updated, with the gain or loss offset against the fair value change of the forwards negotiated.

Cash flow hedge | Exchange rate risk EUR/USD and EUR/GBP

The Company makes use of derivative financial instruments in order to limit the net exchange risk associated with sales and future purchases estimated at USD and GBP.

Cash flow hedge | Interest rate

Navigator hedges future interest payments associated with commercial paper issues by hiring an interest rate swap, which pays a fixed rate and receives a floating rate. This instrument is designated as hedge of cash flows from the commercial paper programme and the bond loan.

Cash flow hedge | Commodities - BHKP

Navigator uses derivative financial instruments in order to minimise the exposure risk associated with the variation of the pulp price, indexed to PIX, in USD.

8.3. Financial assets and liabilities

8.3.1. Categories of Group Financial Instruments

The financial instruments included in each caption of the separate statement of financial position are classified as follows:

Amounts in Euros	Note	Financial assets at amortised cost	Hedging derivative financial instruments	Trading derivative financial instruments	Non-financial assets	Total
31 December 2025						
Non-current receivables	4.2	6,684	-	-	-	6,684
Current receivables	4.2	930,719,933	8,354,583	387,827	29,516,626	968,978,969
Cash and cash equivalents	5.8	456,494,930	-	-	-	456,494,930
Total assets		**1,387,221,548**	**8,354,583**	**387,827**	**29,516,626**	**1,425,480,583**
31 December 2024						
Non-current receivables	4.2	6,684	-	-	-	6,684
Current receivables	4.2	961,165,070	21,022,302	-	51,907,541	1,034,094,913
Cash and cash equivalents	5.8	406,735,567	-	-	-	406,735,567
Total assets		**1,367,907,322**	**21,022,302**	**-**	**51,907,541**	**1,440,837,164**

Amounts in Euros	Note	Financial liabilities at amortised cost	Hedging derivative financial instruments	Trading derivative financial instruments	Financial liabilities outside the scope of IFRS 9	Total
31 December 2025						
Interest-bearing liabilities	5.6	963,710,845	-	-	-	963,710,845
Lease liabilities	5.7	-	-	-	885,953	885,953
Payables	4.3	675,936,503	7,948,178	41,941	-	683,926,622
Total liabilities		**1,639,647,348**	**7,948,178**	**41,941**	**885,953**	**1,648,523,420**
31 December 2024						
Interest-bearing liabilities	5.6	1,073,032,204	-	-	-	1,073,032,204
Lease liabilities	5.7	-	-	-	1,463,763	1,463,763
Payables	4.3	783,360,335	4,680,188	1,631,312	-	789,671,835
Total liabilities		**1,856,392,539**	**4,680,188**	**1,631,312**	**1,463,763**	**1,864,167,801**

8.3.2. Fair value of financial assets and liabilities

Financial assets and liabilities measured at fair value

	31/12/2025			31/12/2024		
Amounts in Euros	Level 1	Level 2	Level 3	Level 1	Level 2	Level 3
Financial assets at fair value through profit or loss						
Trading derivatives	-	387,827	-	-	-	-
Hedging financial instruments	-	8,354,583	-	-	21,022,302	-
Total assets	**-**	**8,742,410**	**-**	**-**	**21,022,302**	**-**
Financial liabilities at fair value through profit or loss						
Trading derivatives	-	(41,941)	-	-	(1,631,312)	-
Hedging financial instruments	-	(7,948,178)	-	-	(4,680,188)	-
Total liabilities	**-**	**(7,990,119)**	**-**	**-**	**(6,311,499)**	**-**

Estimates and judgements

Fair value of fixed-interest interest-bearing liabilities

The fair value of these liabilities is calculated using the discounted cash flow method at the reporting date, using a discount rate in accordance with the characteristics of each financing, belonging to level 2 of the fair value hierarchy of IFRS 13.

Accounting policies

The fair value of financial instruments is classified according to the fair value hierarchy of IFRS 13 - Fair Value Measurement:

Level 1: Based on quotes from active net markets at the reporting date.

Level 2: Determined using evaluation models, the main inputs of which are observable in the market.

Level 3: Determined using evaluation models, the main inputs of which are not observable in the market.

9. Provisions, commitments and contingencies

9.1. Provisions

Movements in provisions

Amounts in Euros	Legal proceedings	Investments in subsidiaries	Other provisions	Total
As at 1 January 2024	**843,046**	**1,287**	**15,500,000**	**16,344,333**
Increases	-	-	94,728	94,728
Reversals	(71,098)			(71,098)
Impact on profit or loss for the period	**(71,098)**	**-**	**94,728**	**23,630**
Other transfers and adjustments	-	256,781	-	256,781
As at 31 December 2024	**771,948**	**258,068**	**15,594,728**	**16,624,744**
Increases	-		248,357	248,357
Reversals	(67,796)	-	-	(67,796)
Impact on profit or loss for the period	**(67,796)**	**-**	**248,357**	**180,561**
Other transfers and adjustments	-	(256,389)	-	(256,389)
As at 31 December 2025	**704,152**	**1,679**	**15,843,085**	**16,548,916**

No repayments of any nature are expected in respect of these provisions.

Legal proceedings

The balance as at 31 December 2025 is essentially comprised of labour lawsuits. The outcome of provisions for legal proceedings depends on the labour or civil court decisions.

Investments in subsidiaries

The amount recognised as provisions for subsidiaries relates solely to the shareholdings held in the subsidiaries Navigator Paper Southern Africa, Navigator Paper Mexico and Navigator Tissue Ibérica which was merged into The Navigator Company Sucursal España as at 1 January 2025 (Note 10).

Other provisions

The amount presented includes provisions to cover risks related to events of a different nature, the resolution of which may result in outflows of cash, in particular organisational restructuring processes, risks of contractual positions assumed in investments, among others.

In 2025, Other provisions include Euro 15,843,085 related to the Mozambique project. Although the Memorandum of Understanding (MoU) signed with the Mozambican Government provided for a "best effort" commitment to create the necessary conditions to carry out the investment until last 31 December 2018, that was not possible until 31 December 2025, and both parties continued to work towards that goal.

The Group's balances relating to income tax uncertainties are disclosed in Note 6.1 – Income Tax..

Accounting policies

Provisions are recognised whenever the Company has a present legal or constructive obligation, as a result of past events, in which it is probable that an outflow of resources will be required to settle the obligation and the amount has been reliably estimated.

Provisions for future operating losses are not recognised. Provisions are reviewed on the date of the statement of financial position and are adjusted to reflect the best estimate at that date.

Investments in subsidiaries

Provisions are recognised for the Company's liabilities for losses on investments in subsidiaries (Note 10), after the related book value has been reduced to zero, to the extent that the Company may have incurred legal or constructive obligations or made payments on behalf of such subsidiaries.

9.2. Commitments

Guarantees provided to third parties

Amounts in Euros	31/12/2025	31/12/2024
Guarantees provided		
Navigator guarantees for EIB loans	8,333,333	11,666,667
Ocean Network Express	2,751,947	2,751,947
Simria	338,829	338,829
Tax and Customs Authority	12,788,455	9,288,070
Administration Fédérale de Contributions	76,585	76,585
Other	56,388	56,074
	24,345,537	**24,178,172**

In the first half of 2024, a bank guarantee was set up in favour of the Tax Authority in the amount of Euro 9,288,070, which stood at Euro 8,731,219 as at 31 December 2025, following the notification received by The Navigator Company at the end of 2023 relating to an additional Corporate Income Tax (CIT) assessment for 2019 arising from adjustments identified during a tax inspection.

Additionally, in the second half of 2025, a new guarantee was provided in the form of a surety bond in the amount of

Euro 4,057,237, as a result of the notification received by The Navigator Company relating to an additional Corporate Income Tax (CIT) assessment for 2021, arising from adjustments identified during a tax inspection.

The Group decided to challenge these additional assessments and refrain from payment and from setting up this bank guarantees.

9.3. Contingent assets and liabilities

Public debt settlement fund

According to Decree-Law 36/93 of 13 February, the tax debts of privatised companies relating to periods prior to the privatisation date (25 November 2006) are the responsibility of the Public Debt Settlement Fund (FRDP). The Navigator Company submitted an application to the FRDP on 16 April 2008, requesting the payment of the tax debts until then settled by the Tax Authorities. On 13 December 2010, The Navigator Company presented a new application requesting the payment of debts settled by the tax authorities regarding 2006 and 2003. This application was supplemented on 13 October 2011, with the amounts already paid and uncontested regarding these debts, as well as with expenses directly related to them, pursuant to court ruling dated 24 May 2011 (Case 0993A/02), which confirmed the Company's position regarding the enforceability of such expenses.

On 13 December 2017, The Navigator Company, S.A. has made an extra-judicial agreement with the Tax Authorities, in which it was acknowledged the FRDP responsibility for refunding the amount of Euro 5,725,771 corresponding to the amount of Corporate Income Tax (IRC) unduly paid, resulting from the alleged qualification/incorrect consideration, by the Tax Authorities, of the tax loss calculated as a result of the operations performed by Soporcel, S.A. in 2003, as well as to promote the reimbursement to Navigator of the mentioned amount.

In January 2023, the Court, while rejecting in their entirety the defendants' pleas in law, issued a judgement against the Navigator Group and acquitted the defendants of the claim relating to the 2006 aggregate corporate income tax. Following this decision, the Group appealed to the Supreme Administrative Court in February 2023.

Navigator was notified on 12 December 2024 of a ruling that upheld the formal objection raised by the Defendants and acquitted them of the claim relating to the aggregate corporate income tax for 2001 to 2005. Navigator was notified on 12 December 2024 of a ruling that upheld the formal objection raised by the Defendants and acquitted them of the claim relating to the aggregate corporate income tax for 2001 to 2005. Following this decision, the Group filed an appeal with the Central Administrative Court - South on 28 January 2025.

In this context, FRDP is liable for Euro 21,853,377, detailed as follows:

Amounts in Euros	Period	Requested amounts	Decrease due to RERD	Proceedings decided in favour of the Group	Outstanding amounts
Proceedings confirmed in court					
Corporate Income Tax	2002	18,923	-	-	18,923
Corporate Income Tax (RF)	2004	3,324	-	-	3,324
Corporate Income Tax	2004	766,395	-	(111,544)	654,851
Expenses		314,957	-	(314,957)	-
		1,103,599	**-**	**(426,501)**	**677,098**
Proceedings not confirmed in court					
Corporate Income Tax	2005	11,754,680	(1,360,294)	-	10,394,386
Corporate Income Tax	2006	11,890,071	(1,108,178)	-	10,781,893
		23,644,751	**(2,468,472)**	**-**	**21,176,279**
		24,748,350	**(2,468,472)**	**(426,501)**	**21,853,377**

Regarding the aggregate corporate income tax proceedings of 2005 and 2006, if Courts come to a decision in favour of Navigator Group, the Group will withdraw the request made to FRDP.

Public Debt Settlement Fund - Proceeding 774/11.3 BEALM

Additionally, a new petition was filed in the Administrative Court of Almada on 11 October 2011, which called for the repayment of various amounts, amounting to Euro 136,243,949. These amounts regard adjustments in the financial statements of the Group after its privatisation that had not been considered in formulating the price of its privatisation as they were not included in the documentation made available for consultation by the bidders.

On 24 May 2014, the Court denied the Navigator Group's proposal to present testimony evidence, alternatively proposing written submissions. On 30 June 2014, the Group appealed against this decision but continuously presented written evidence. The Court ruled in favour of the Group's claims in this regard; experts were appointed by the parties; the expert report was issued in July 2017; and, following this, both The Navigator Company, S.A. and the Ministry of Finance requested that the appointed experts appear at the hearing to provide oral explanations regarding the expert report.

Following claims filed by Navigator on 11 September 2017 and 15 January 2019, the experts submitted redrafted Expert Reports on 27 December 2018 and 19 March 2019, respectively.

The trial hearing took place between May and June 2019, with the parties filing closing arguments in September 2019, awaiting the passing of sentence since the case was concluded before the judge on 5 July 2021.

10. Group structure

10.1. Investments in subsidiaries

Company		Head Office	31/12/2025 Equity	% held	Balance	31/12/2024 Equity	% held	Balance
Navigator Brands, S.A.	(A)	Portugal	31,772,140	100	408,528,526	32,980,074	100	409,736,461
Navigator Pulp Aveiro, S.A.	(B)	Portugal	107,596,224	100	108,326,746	127,514,690	100	126,968,573
Enerpulp, S.A.		Portugal	77,508,420	100	77,508,420	74,815,748	100	74,815,748
Navigator Parques Industriais, S.A.		Portugal	79,229,588	100	79,229,588	83,849,012	100	83,849,012
Portucel Moçambique, S.A.		Mozambique	14,502,404	90	14,502,404	9,867,605	90	9,867,605
Navigator Tissue Ibérica	(D)	Spain	-	-	-	(257,003)	100	(257,003)
Navigator Pulp Setúbal, S.A.		Portugal	43,535,112	100	43,535,112	83,278,156	100	83,278,156
Navigator Pulp Figueira, S.A.		Portugal	175,742,263	100	175,742,263	207,462,036	100	207,462,036
Navigator Abastecimento de Madeira, ACE		Portugal	-	97	-	-	97	-
Navigator Forest Portugal, S.A.		Portugal	54,926,645	100	54,926,645	57,395,214	100	57,395,214
Navigator Paper Setúbal, S.A.	(B)	Portugal	308,608,485	100	308,120,088	405,437,380	100	390,428,273
Navigator Tissue Aveiro, S.A.	(B)	Portugal	117,347,903	100	117,424,975	128,368,371	100	128,294,779
Raíz - Inst.Investigação Floresta e Papel		Portugal	12,994,849	97	12,605,003	12,011,573	97	11,651,225
Navigator Tissue Ejea, S.L.	(C)	Spain	96,896,277	100	101,006,927	81,744,640	100	85,737,531
Navigator Paper Figueira, S.A.	(B)	Portugal	80,406,159	100	76,086,979	89,834,744	100	77,061,617
Pulpchem Logistics, A.C.E.		Portugal	-	50	-	-	50	-
Empremédia - Corretores de Seguros, S.A.		Portugal	6,056,017	100	6,056,017	5,460,865	100	5,460,865
Empremedia DAC		Ireland	7,638,712	100	7,638,712	7,651,039	100	7,651,040
Empremedia RE DAC		Ireland	19,721,054	100	19,721,054	19,093,632	100	19,093,632
Navigator Paper Mexico		Mexico	(6,712)	25	(1,678)	(2,076)	25	(519)
Navigator Egypt		Egypt	49,903	1	499	33,541	1	335
Navigator Green Fuels Setúbal, S.A.		Portugal	33,187	100	33,187	35,515	100	35,515
Navigator Green Fuels Figueira da Foz, S.A.		Portugal	37,723	100	37,723	38,610	100	38,610
Navigator Paper Southern Africa		South Africa	151,504	1	1,515	(54,639)	1	(546)
Portucel Nigeria Limited		Nigeria	-	1	-	-	1	-
					1,611,030,705			**1,778,568,159**
Provisions for subsidiaries with a negative net worth					**1,678**			**258,068**
Investments in subsidiaries					**1,611,032,383**			**1,778,826,227**

(A) Includes Goodwill generated on the acquisition of the Figueira da Foz integrated pulp and paper business.
(B) Balance sheet value reflects elimination of unrealised internal margins
(C) Includes goodwill generated on the acquisition of the consumer tissue business in Zaragoza, Spain.
(D) Merger with The Navigator Company in 2025.

The goodwill associated with the integrated pulp and paper production activity in Figueira da Foz, in the amount of Euro 376,756,383, and with the tissue production activity in Zaragoza, in the amount of Euro 4,156,542, is disclosed in the table above as part of the value of the financial investment under the equity method, in accordance with the requirements of IAS 27 and IAS 28.

Movements in the period

Movements in investments in subsidiaries - summary

Amounts in Euros	2025	2024
Opening balance	**1,778,826,227**	**1,751,528,123**
Acquisitions, incorporations and disposal of shareholdings	-	15,266,674
Mergers, demergers and liquidations	257,003	-
Additional capital contributions	2,500,000	4,000,000
Share of (loss)/gains from the application of the equity method	101,902,205	192,493,281
Other comprehensive income	(672,584)	9,086,118
Dividends distributed	(271,524,080)	(193,804,947)
Capital increases and decreases	-	197
Transfer to provisions (Note 9.1)	(256,389)	256,781
Other movements	-	-
Closing balance	**1,611,032,383**	**1,778,826,227**

In 2025, additional capital contributions, in cash and free of charge, amounting to Euro 2,500,000 were made to the subsidiary Portucel Moçambique, S.A.; in 2024, such contributions amounted to Euro 4,000,000.

Movements in investments in subsidiaries - details

Amounts in Euros	2025	2024
Opening balance	**1,778,826,227**	**1,751,528,123**
Mergers, demergers and liquidations		
Navigator Tissue Ibérica	257,003	-
Mergers, demergers and liquidations	**257,003**	**-**
Additional capital contributions		
Navigator Forest Portugal, S.A.	-	-
Portucel Moçambique, Lda.	2,500,000	4,000,000
Additional capital contributions	**2,500,000**	**4,000,000**
Acquisition, incorporation and disposal of shareholdings		
Navigator Tissue Ejea, S.L.	-	-
Empremedia RE DAC	-	15,165,286
Navigator Tissue Ibérica	-	101,097
Navigator Fiber Solutions , S.A.	-	291
Acquisition, incorporation and disposal of shareholdings	**-**	**15,266,674**
Share of (loss)/gains from the application of the equity method		
Navigator Brands, S.A.	7,397,061	17,330,104
Navigator Pulp Aveiro, S.A.	6,595,342	29,746,942
Enerpulp, S.A.	17,148,163	14,843,057
Navigator Parques Industriais, S.A.	7,814,743	9,554,678
Portucel Moçambique, Lda.	3,435,036	(4,414,843)
Navigator Paper Southern Africa	2,245	490
Navigator Pulp Setúbal, S.A.	(14,751,907)	23,348,730
Navigator Pulp Figueira, S.A.	1,087,742	38,028,653
Navigator Forest Portugal, S.A.	(3,012,032)	727,212
Navigator Tissue Aveiro, S.A.	21,578,949	33,356,224
Navigator Paper Setúbal, S.A.	16,777,432	2,668,095
Raiz - Inst.Investigação Floresta e Papel	825,224	1,164,575
Navigator Tissue Ejea, S.L.	15,269,396	14,529,078
Navigator Paper Figueira, S.A.	19,449,864	6,945,092
Navigator Tissue Ibérica	-	(358,100)
Empremédia - Corretores de Seguros, S.A.	1,673,880	1,295,243
Empremedia RE DAC	627,422	3,928,346

Amounts in Euros	2025	2024
Empremedia DAC	(12,328)	(177,805)
Navigator Paper Mexico	(1,137)	333
Navigator Egypt	325	24
Navigator Green Fuels Setúbal, S.A.	(2,328)	(12,824)
Navigator Green Fuels Figueira da Foz, S.A.	(887)	(9,729)
Navigator Fiber Solutions , S.A.	-	(294)
Share of (loss)/gains from the application of the equity method	**101,902,205**	**192,493,281**
Changes in the investee's equity not recognised in the income statement		
Enerpulp, S.A.		-
Navigator Brands, S.A.	5,925,108	899,567
Navigator Forest Portugal, S.A.	543,464	(15,024)
Navigator Paper Setúbal, S.A.	(5,970,856)	9,129,629
Navigator Pulp Figueira, S.A.	-	-
Raiz - Inst.Investigação Floresta e Papel	128,553	(86,916)
Portucel Moçambique, S.A.	(1,300,237)	(840,474)
Navigator Paper Southern Africa	(184)	54
Empremédia - Corretores de Seguros, S.A.	1,752	849
Empremedia DAC	-	-
Navigator Paper Mexico	(22)	(1,527)
Navigator Egypt	(161)	(40)
Changes in the investee's equity not recognised in the income statement	**(672,584)**	**9,086,118**
Distribution of dividends/reserves		
Navigator Brands, S.A.	(14,530,103)	(17,893,533)
Navigator Pulp Aveiro, S.A.	(25,237,170)	(8,902,223)
Navigator Parques Industriais, S.A.	(12,434,166)	(11,120,940)
Navigator Forest Portugal, S.A.	-	(2,330,370)
Navigator Pulp Setúbal, S.A.	(24,991,137)	(13,000,331)
Navigator Pulp Figueira, S.A.	(32,807,515)	(18,926,544)
Navigator Paper Setúbal, S.A.	(93,114,762)	(36,586,894)
Navigator Tissue Aveiro, S.A.	(32,448,754)	(39,874,557)
Navigator Paper Figueira, S.A.	(20,424,502)	(28,448,895)
Empremédia - Corretores de Seguros, S.A.	(1,080,480)	(1,028,647)
Navigator Tissue Ejea, S.L.	-	(1,155,065)
Enerpulp, S.A.	(14,455,491)	(14,536,945)
Distribution of dividends/reserves	**(271,524,080)**	**(193,804,947)**
Share capital increases/(decreases)		
Navigator Fiber Solutions , S.A.	-	-
Navigator Brands, S.A.	-	-
Navigator Pulp Setúbal, S.A.	-	-
Navigator Paper Southern Africa	-	197
Share capital increases/(decreases)	**-**	**197**
Other movements and reclassifications	**-**	**-**
Closing balance	**1,611,288,772**	**1,778,569,446**
Provisions for subsidiaries (Note 9.1)	(256,389)	256,781
Closing balance considering Provisions	**1,611,032,383**	**1,778,826,227**

Estimates and judgements

As at 31 December 2025 the amount of equity interests recognised in the separate financial statements of The Navigator Company, S.A., by applying the equity method amounts to Euro 1,611 million (2024: Euro 1,779 million), which includes goodwill allocated to the integrated paper cash-generating unit in Figueira da Foz and the tissue paper cash-generating unit in Zaragoza. Goodwill is not amortised and is subject to impairment tests, at least annually, and whenever there are changes in the assumptions underlying the test performed at the date of the statement of financial position which result in a possible loss of value. The recoverable amounts of cash-generating units have been determined based on value-in-use calculations. These calculations require the use of estimates.

As at 31 December 2025, a possible increase of 0.5% in the discount rate used in the impairment test of Goodwill allocated to the cash-generating unit in Figueira da Foz integrated Paper, would imply a decrease in the assessment in the amount of Euro 215,929,016 (31 December 2024: Euro 273,710,850), which is still approximately 4 times higher than the book value of this cash-generating unit.

Moreover, the 0.5% increase in the discount rate used in the impairment test for Navigator Tissue Ejea would result, as at 31 December 2025, in a decrease in the valuation of Euro 27,944,625 (31 December 2024: Euro 15,985,812), which is still around 2.5 times higher than the book value of this cash-generating unit.

Accounting policies

Subsidiaries are all entities over which the Company has control, which occurs when the Company is exposed or entitled to the variable returns resulting from its involvement with the entities and has the capacity to affect that return through the exercise of power over the entities, regardless of the percentage they hold over equity.

The existence and the effect of potential voting rights which are currently exercisable or convertible are considered when the Company assesses whether it has control over another entity.

Measurement

Investments in subsidiaries are accounted under the equity method.

In accordance with the equity method, financial investments are recorded at their acquisition cost, subsequently adjusted by the amount corresponding to the Company's share of changes in shareholders' equity (including net profit) of the subsidiaries, against results for the period or against shareholders' equity, as applicable, and by dividends received.

The accounting policies of joint ventures are amended, when necessary, to ensure that they are applied consistently with those of Navigator.

When the Company’s share in the subsidiary’s losses is equal to or exceeds its investment in the subsidiary, the Company ceases to recognise additional losses, except where it has assumed liability or made payments in the subsidiary’s name, as detailed in Note 9.1 - Provisions. If they subsequently report profits, the Company resumes recognising its share of those profits only after its share of the profits equals the share of unrecognised losses.

10.2. Transactions with related parties

Balances with related parties

Amounts in Euros	31/12/2025				31/12/2024			
	Cash - Cash Pooling (Note 5.8)	Receivables (Note 4.2)	Payables (Note 4.3)	Interest-bearing liabilities - Cash Pooling (Note 5.6)	Cash - Cash Pooling (Note 5.8)	Receivables (Note 4.2)	Payables (Note 4.3)	Interest-bearing liabilities - Cash Pooling (Note 5.6)
Shareholders								
Semapa - Soc. de Investimento e Gestão, SGPS, S.A.	-	18,491	2,193,310	-	-	-	1,155,456	-
Subsidiaries								
Portucel Moçambique, Lda.	-	9,707,063	180,618	-	-	8,777,898	179,039	-
Eucaliptusland, S.A.	-	-	-	-	549,394	4,341,162	19,636,644	-
Enerpulp, S.A.	-	9,173,012	3,890	23,805,399	13,144,987	8,256,303	-	-
Navigator Forest Portugal, S.A.	14,822,462	177,650,192	19,633,090	-	544,841	177,844,533	44,669	3,304,198
Empremédia, S.A.	-	542,422	2,501,874	-	-	394,980	2,500,000	-
Navigator Tissue Aveiro, S.A.	11,980,933	121,356,676	9,839,290	-	13,335,910	124,992,364	26,337,286	-
Viveiros Aliança, S.A.	3,145,397	27,855	44,363	-	1,629,545	21,084	115,247	-
Navigator Paper Setúbal, S.A.	-	233,605,095	59,760,038	70,877,492	-	8,024,351	81,074,841	64,083,164
Navigator Paper Figueira, S.A.	3,074,930	41,071,072	84,785,578	-	18,657,449	52,002,492	95,496,936	-
Navigator Pulp Setúbal, S.A.	203,110,519	4,370,958	32,980,611	-	64,419,401	26,437,895	18,519,994	-
Navigator Tissue Ródão, S.A.	-	26,762,103	130,432,304	9,283,764	-	23,252,539	117,668,427	21,514,273
Navigator Pulp Figueira, S.A.	31,918,754	5,310,820	43,917,398	-	-	22,061,407	40,712,675	56,588,888
Raiz - Instituto de Investigação da Floresta e Papel	-	257,322	6,459,782	1,876,496	-	203,372	6,474,989	1,853,006
Navigator Brands, S.A.	-	1,283,731	7,170,911	25,674,480	-	6,986,203	10,709,598	32,627,521
Navigator Pulp Aveiro, S.A.	75,813,817	2,859,819	42,779,081	-	24,719,288	13,561,674	39,022,990	-
Navigator Parques Industriais, S.A.	-	16,215,624	56,581	27,472,014	-	6,460,821	58,469	18,383,729
Navigator Abastecimento de Madeira, ACE	6,488,950	147,395	89,004	-	5,921,193	319,462	192,245	18,358,609
Bosques do Atlantico, S.L.	8,616,902	707	28,905,660	-	5,565,479	-	28,848,149	-
PulpChem Logístics, ACE	-	1,735,582	-	-	-	-	2,309,328	-
Navigator North America	-	-	7,868,446	-	-	4,862,273	17,141,844	-
Navigator Eurasia	-	45,317	-	-	-	34,540	-	-
Navigator Afrique du Nord	-	29,224	-	-	-	23,072	-	-
Navigator United Kingdom, Ltd	-	-	10,216,726	-	-	203,005,905	18,400,507	-
Gavião - Sociedade de Caça e Turismo, S.A.	-	13,262	1,334,590	511,715	-	19,772	1,335,146	192,451
Navigator Tissue Ibérica	-	-	-	-	-	11,167,315	11,769,427	-
Navigator Tissue UK Limited	-	5,769,286	171,151	-	-	3,644,227	-	-
Navigator Netherlands B.V.	-	-	4,088	-	-	-	-	-
Navigator France, SAS	-	2,364	-	-	-	2,469	-	-
Navigator Deutschland, GmbH	-	-	6,973	-	-	-	15,141	-
Navigator Austria	-	73,762	-	-	-	80,941	-	-
Navigator Africa SRL	-	6,000	-	-	-	2,000	-	-
Navigator Paper Poland SP Zoo	-	3,689	-	-	-	21,364	-	-
Navigator Tissue Ejea, S.L.	1,074,880	7,093,162	48,528,130	-	-	20,668,217	8,352,301	-
Navigator Egypt, ELLC	-	-	58	-	-	-	58	-
Navigator Paper Southern Africa	-	4,854,840		-	-	4,248,982	144,430	-
Navigator Tissue France	-	10,127,839	234,638	2,341,690	-	9,793,430	964,397	-
Empremedia DAC	-	150,000	7,495,101	-	-	40,000	7,501,300	-
EMA Cacia - Engenharia e Manutenção Industrial, ACE	-	-	537	301,604	-	-	539	248,402
EMA Setúbal - Engenharia e Manutenção Industrial, ACE	-	-	846	389,332	-	-	943	386,097
EMA Figueira - Engenharia e Manutenção Industrial, ACE	-	-	1,164	656,072	-	-	1,041	382,281
Navigator Green Fuels Setúbal, S.A.	-	-	63	28,243	-	-	1,890	-
Navigator Green Fuels Figueira da Foz, S.A.	-	-	46	20,603	-	-	2,003	35,553
GREENBLOOM A.C.E.	-	-	-	558,439	-	-	-	-
Navigator Fiber Solutions , S.A.	358,680	19,855	1,838	-	418,989	11,135	224	44,670
Other related parties								
Secil Britas, S.A.	-	-	6,060	-	-	-	19,709	-
Hotel Ritz, S.A.	-	-	-	-	-	-	844	-
	360,406,224	**680,284,539**	**547,603,838**	**163,797,343**	**148,906,476**	**741,564,182**	**556,708,726**	**218,002,842**

Transactions with related parties

Amounts in Euros	2025 Purchases of goods and services	2025 Sales and services rendered	2025 Payroll costs	2025 Other operating income	2025 Other operating expenses	2025 Financial (expenses) / income	2024 Purchases of goods and services	2024 Sales and services rendered	2024 Payroll costs	2024 Other operating income	2024 Financial (expense) / income
Shareholders											
Semapa - Soc. Invest. e Gestão, SGPS, S.A.	13,585,537	-	-	59,200	-	-	11,523,914	-	-	-	-
	13,585,537	**-**	**-**	**59,200**	**-**	**-**	**11,523,914**	**-**	**-**	**-**	**-**
Subsidiaries										-	
Eucaliptusland, S.A.	-	-	-	-	-	-	-	1,870,732	-	-	(1,128,473)
Enerpulp, S.A.	(136,747)	10,462,225	(109,172)	-	-	435,208	(190,811)	3,678,536	(108,599)	-	242,365
Navigator Brands, S.A.	12,301,359	2,583,457	2,463,570	785	-	(1,039,706)	23,547,789	3,389,624	2,892,199	996	(2,166,667)
Navigator Forest Portugal, S.A.	(27,485)	2,301,654	(239,229)	-	-	4,525,322	(25,078)	1,501,002	(617,250)	-	7,435,913
Empremédia, S.A.	7,011	-	-	-	-	35,755	-	-	-	-	28,336
Navigator Tissue Aveiro, S.A.	109,606,473	63,599,406	-	-	-	3,030,174	114,360,950	67,949,389	-	-	4,214,637
Viveiros Aliança, S.A.	390,882	-	(93)	-	-	46,272	364,189	-	-	-	57,783
Navigator Paper Setúbal, S.A.	480,531,052	315,296,764	(6,416,257)	-	-	1,518,267	531,133,392	381,206,558	(7,591,524)	48,789	(3,598,687)
Navigator Tissue Ejea, S.L.	123,663,990	49,758,429	-	3,688	-	(123,683)	60,285,712	47,233,292	-	-	970,670
PulpChem Logistics, ACE	28,930,693	-	-	-	-	-	26,513,779	-	-	-	-
Navigator Pulp Setúbal, S.A.	222,942,686	29,205,352	(4,598,073)	-	(835)	2,483,508	276,956,633	45,895,237	(4,916,247)	-	2,162,743
Navigator Tissue Ródão, S.A.	119,308,362	71,967,562	(85,208)	-	-	(4,903,135)	115,722,989	65,158,826	(93,447)	-	(6,617,503)
Navigator Pulp Figueira, S.A.	321,972,997	37,304,534	(5,608,617)	661	(75)	1,849,003	403,696,768	58,915,884	(7,194,124)	-	(104,098)
Raiz	(4,164)	361,385	-	-	(500)	(283,188)	(6,598)	214,576	(145)	-	(331,779)
Navigator United Kingdom, Ltd	16,750,379	-	-	-	-	-	19,289,001	-	-	1,556,091	4,391,042
Navigator Tissue Ibérica	-	-	-	-	-	-	1,766,063	49,976,837	-	-	-
Navigator Paper Figueira, S.A.	430,407,842	315,212,335	-	(24,000)	-	(51,761)	484,386,102	380,886,900	-	-	(1,732,490)
Navigator Pulp Aveiro, S.A.	182,506,482	17,388,536	(2,560,992)	416,667	-	1,076,287	244,106,884	32,111,651	(2,448,841)	-	1,963,359
Navigator Parques Industriais, S.A.	-	5,289,075	-	-	-	(108,294)	-	2,856,483	-	-	(718,948)
Navigator North America	160,489	64,123,763	-	-	-	-	300,269	73,956,435	-	(953,229)	-
Portucel Moçambique, Lda.	(22,505)	-	(160)	-	-	5,350	(8,864)	-	(537)	9,814	-
Bosques do Atlantico, S.L.	(1,666)	-	-	707	-	-	(1,498)	-	-	-	-
Empremedia DAC	-	-	-	-	-	-	-	-	-	-	44,232
Navigator Afrique du Nord	-	-	-	1,903	-	-	-	-	-	1,882	-
Gavião, S.A.	-	-	-	-	-	(52,938)	-	-	-	-	(73,406)
Navigator Itália, SRL	1,282	-	-	-	-	-	-	-	-	-	-
Navigator Netherlands B.V.	4,088	-	-	-	-	-	-	-	-	-	-
Navigator France SAS	-	-	-	16,914	-	-	-	-	-	2,469	-
Navigator Paper Southern Africa	-	4,016,653	-	(88)	(2,689)	-	-	3,733,201	-	(128,766)	-
Navigator Deutschland, GmbH	205,359	-	-	-	-	-	105,606	-	-	-	-
Navigator Austria	-	-	-	-	-	-	-	-	-	3,093	-
Navigator Paper Poland SP Zoo	-	-	-	12,827	-	-	-	-	-	6,929	-
Navigator Eurasia	-	-	-	10,777	-	-	-	-	-	9,332	-
Navigator Abastecimento de Madeira, ACE	(28,075)	-	(335,782)	-	-	169,003	(31,670)	346	(352,327)	-	438,732
Navigator Green Fuels Setúbal, S.A.	-	-	-	-	-	(718)	-	-	-	-	(1,890)
Navigator Green Fuels Figueira da Foz, S.A.	-	-	-	-	-	(846)	-	-	-	-	(2,003)
Navigator Fiber Solutions , S.A.	2,258	-	(865)	-	-	21,900	(20,087)	-	(900)	-	6,005
Navigator Tissue France	30,249	62,141,914	-	3,860	-	-	865,681	59,798,139	-	-	-
Navigator Tissue UK Limited	15,620	54,140,988	-	-	-	-	-	3,770,847	-	-	-
Navigator Middle East	-	-	-	-	-	-	-	-	-	-	-
EMA Cacia, ACE	-	-	-	-	-	(7,372)	-	-	-	-	(8,576)
EMA Setúbal, ACE	-	-	-	-	-	(8,547)	-	-	-	-	(12,982)
EMA Figueira, ACE	-	-	-	-	-	(13,282)	-	-	-	-	(15,510)
	2,049,518,911	**1,105,154,032**	**(17,490,878)**	**444,701**	**(4,099)**	**8,602,579**	**2,303,117,201**	**1,284,104,495**	**(20,431,743)**	**557,400**	**5,442,805**
Other related parties											
Secil Britas, S.A.	19,328	-	-	-	-	-	37,750	-	-	-	-
Triangles – Cycling Eqyipments	-	-	-	(44,639)	-	-		-	-	-	-
Hotel Ritz, S.A.	5,908		-	-	-	-	7,806	-	-	-	-
	25,236	**-**	**-**	**(44,639)**	**-**	**-**	**45,556**	**-**	**-**	**-**	**-**

The remuneration of the Group's key management personnel is detailed in Note 7.3 – Remuneration of corporate bodies.

11. Note added for translation

The accompanying financial statements are a translation of financial statements originally issued in Portuguese. In the event of any discrepancies the Portuguese version prevails.

BOARD OF DIRECTORS

Ricardo Miguel dos Santos Pacheco Pires
Board of Directors Chairman

António José Pereira Redondo
Chairman of the Executive Board

José Fernando Morais Carreira de Araújo
Executive Board Member

Nuno Miguel Moreira de Araújo Santos
Executive Board Member

João Paulo Cabete Gonçalves Lé
Executive Board Member

Dorival Martins de Almeida
Executive Board Member

António Quirino Vaz Duarte Soares
Executive Board Member

Maria Teresa Aliu Presas
Member

Mariana Rita Antunes Marques dos Santos
Member

Vítor Paulo Paranhos Ferreira
Member

Ana Teresa Cunha de Pinto Tavares Lehmann
Member

Hugo Alexandre Lopes Pinto
Member

Maria Isabel da Silva Marques Abranches Viegas
Member

ANNUAL REPORT 2025

Statutory Auditors' Report and Auditors' Report

STATUTORY AUDITORS' REPORT and AUDITORS' REPORT

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS

Opinion

We have audited the accompanying financial statements of **The Navigator Company, S.A.** (the Entity), which comprise the statement of financial position as at 31 December 2025 (showing a total of Euro 3,085,071,701 and total equity of Euro 1,412,739.030, including a profit for the year attributable to shareholders of Euro 144,667,435), and the separate income statement, separate statement of comprehensive income, separate statement of changes in equity and separate statement of cash flows for the year then ended, and the accompanying notes to the financial statements, including a summary of accounting policies.

In our opinion, the accompanying financial statements give a true and fair view, in all material respects, of the financial position of **The Navigator Company, S.A.** as at 31 December 2025 and of its financial performance and its cash flows for the year then ended in accordance with the International Financial Reporting Standards (IFRS) as adopted by the European Union.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) and further technical and ethical standards and guidelines as issued by *Ordem dos Revisores Oficiais de Contas* (the Portuguese Institute of Statutory Auditors). Our responsibilities under those standards are further described in the "Auditors' Responsibilities for the Audit of the Financial Statements" section below. We are independent of the Entity in accordance with the law and we have fulfilled other ethical requirements in accordance with the *Ordem dos Revisores Oficiais de Contas*' code of ethics.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current year. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Valuation of financial investments (Euro 1,611,032,383)

See Note 1.5 Significant accounting estimates and judgements and Note 10.1 of the notes to the Financial Statements.

The Risk	Our response to the identified risk
The valuation of the Entity's financial investments requires a high degree of estimate and judgement by the Board of Directors, namely with regard to the calculation of the recoverable value of the investments made when signs of impairment are identified.	Our audit procedures included, amongst others, those that we describe below: • We assessed the design and implementation of the main controls implemented by the Entity in this matter and analysed the budgeting procedures on which the projections are based, by comparing the current performance with estimates made in previous periods, and the integrity of the discounted cash flow model; • We assessed whether there were signs of impairment in the financial investments; • When signs of impairment are identified, we obtained and analysed the impairment tests of the financial investments, based on discounted cash flow models, carrying out the following procedures: - We verified the arithmetic accuracy of the models; - We assessed the significant internal and external assumptions used and their reasonableness, such as current business trends, market performance, inflation, projected economic growth and discount rates; - We conducted sensitivity analyses on the assumptions and projections used; and - We involved our specialists in assessing the average cost of capital. • We assessed the adequacy of the relevant disclosures of the financial statements, in accordance with the applicable accounting framework.

Responsibilities of management and the supervisory body for the separate financial statements

Management is responsible for:

- the preparation of separate financial statements that give a true and fair view of the Entity's separate financial position, financial performance and the separate cash flows, in accordance with the International Financial Reporting Standards (IFRS) as adopted by the European Union;
- the preparation of the management report, the corporate governance report, the non-financial information and the remunerations' report in accordance with applicable laws and regulations;
- designing and maintaining an appropriate internal control system to enable the preparation of separate financial statements that are free from material misstatement, whether due to fraud or error;

- the adoption of accounting policies and principles appropriate in the circumstances; and
- assessing the Entity's ability to continue as a going concern, and disclosing, as applicable, the matters that may cast significant doubt about the Entity's ability to continue as a going concern.

The supervisory body is responsible for overseeing the Entity's financial reporting process.

Auditors' Responsibilities for the Audit of the Separate Financial Statements

Our responsibility is to obtain reasonable assurance about whether the separate financial statements as a whole are free from material misstatements whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISA, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Entity's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Entity to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the separate financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation;

- communicate with those charged with governance, including the supervisory body, regarding, among other matters, the planned scope and timing of the audit, and significant audit findings including any significant deficiencies in internal control that we identify during our audit;
- determine, from the matters communicated with those charged with governance, including the supervisory body, those matters that were of most significance in the audit of the separate financial statements of the current year and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes their public disclosure; and,
- provide the supervisory body with a statement that we have complied with the relevant ethical requirements regarding independence and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

Our responsibility also includes the verification that the information contained in the management report is consistent with the separate financial statements, and the verification of the requirements as provided in Article 451 nr. 4 and 5 of the Portuguese Companies' Code regarding the corporate governance report, as well as the verification that the non-financial information and the remunerations report were presented.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

On the management report

Pursuant to Article 451, nr. 3 (e) of the Portuguese Companies' Code, it is our opinion that the management report was prepared in accordance with the applicable legal and regulatory requirements and the information contained therein is consistent with the audited financial statements and, having regard to our knowledge and assessment of the Entity, we have not identified any material misstatements. As defined in Article 451 nr. 7, of the Portuguese Companies' Code, this opinion is not applicable to the non-financial statement that is included in the consolidated management report.

On the Corporate Governance Report

Pursuant to Article 451, nr. 4 of the Portuguese Companies' Code, it is our opinion that the corporate governance report includes the information required to the Group to provide under Article 29-H of the Securities Code, and we have not identified any material misstatements on the information provided therein in compliance with paragraphs c), d), f), h), i) and l) of nr. 1 of that Article.

On the non-financial information

Pursuant to Article 451, nr. 6, of the Portuguese Companies' Code, we inform that the Group has prepared a separate report which includes the consolidated non-financial information as provided for in Article 66-B of the Portuguese Companies' Code.

On the remunerations' report

Pursuant to Article 26-G, nr. 6, of the Securities Code, we inform that the Entity has included in the corporate governance report, in a separate chapter, the information provided in nr. 2 of that Article.

On the European single electronic format (ESEF)

The consolidated financial statements of The Navigator Company, S.A. for the year ended 31 December 2025 must comply with the applicable requirements established by the Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 (ESEF Regulation).

Management is responsible for the preparation and presentation of the annual report in accordance with the ESEF Regulation.

Our responsibility is to obtain reasonable assurance about whether the financial statements, included in the annual report, have been prepared in accordance with the requirements of the ESEF Regulation.

Our procedures considered the OROC (Portuguese Institute of Statutory Auditors) Technical Application Guide on ESEF reporting and included obtaining an understanding of the financial reporting process, including the presentation of the annual report in a valid XHTML format.

In our opinion, the financial statements included in the annual report are presented, in all material respects, in accordance with the requirements established in the ESEF Regulation.

On the additional matters provided in Article 10 of the Regulation (EU) 537/2014

Pursuant to Article 10 of the Regulation (EU) 537/2014 of the European Parliament and of the Council, of 16 April 2014, and in addition to the key audit matters mentioned above, we also report the following:

- We were first appointed as auditors of the Entity in the General Shareholders Meeting held on 22 September 2017 for the last mandate from 2015 to 2018. We were reappointed as auditors in the General Shareholders Meeting held on 9 April 2019 for a second mandate from 2019 to 2022, and on 17 May 2023 for a third mandate from 2023 to 2025. In the General Shareholders Meeting held on 29 May 2025, we were appointed to a fourth mandate from 2025 to 2027.
- Management as confirmed to us that they are not aware of any fraud or suspicion of fraud having occurred that has a material effect on the financial statements. In planning and executing our audit in accordance with ISAs we maintained professional scepticism, and we designed audit procedures to respond to the possibility of material misstatement in the consolidated financial statements due to fraud. As a result of our work, we have not identified any material misstatement of the separate financial statements due to fraud.
- We confirm that the audit opinion we issue is consistent with the additional report that we prepared and delivered to the supervisory body of the Entity on 10 April 2026.
- We declare that we have not provided any prohibited services as described in under Article 5 of Regulation (EU) 537/2014 of the European Parliament and of the Council, of 16 April 2014, and we have remained independent of the Entity in conducting the audit.

10 April 2026

SIGNED ON THE ORIGINAL

KPMG & Associados -
Sociedade de Revisores Oficiais de Contas, S.A.
(ROC no. 189 and registered at CMVM with no. 20161489)
Represented by
Rui Filipe Dias Lopes
(ROC no. 1715 and registered at CMVM with no. 20161325)

ANNUAL REPORT 2025

Report and Opinion of the Audit Board

(TRANSLATION OF A REPORT ORIGINALLY ISSUED IN PORTUGUESE; IN CASE OF DISCREPANCIES THE PORTUGUESE VERSION PREVAILS)

The Navigator Company, S.A.

Report and Opinion of the Audit Board
Separate Financial Statements

2025 Financial Year

To the Shareholders,

1. In accordance with the Law, the Articles of Association of the Company, and under the terms of the mandate conferred upon us, we hereby submit the report on our supervisory activities carried out in 2025 and issue our opinion on the Management Report (included in the Annual Report) and Separate Financial Statements presented by the Board of Directors of the Navigator Company, S.A., (*Company*) for the year ended 31 December 2025.

2. Over the course of the year, we regularly monitored the activities of the Company, as often and as extensively as we deemed appropriate, through regular meetings with the Company's Directors and Managers. We monitored the verification of the accounting records and respective supporting documentation, as well as the effectiveness of the risk management, internal control and the internal audit systems. We monitored compliance with the Law and the Articles of Association. In the course of our activities, we encountered no constraints whatsoever.

3. We have met several times with KPMG & Associados, SROC,S.A., in their capacity as Statutory Auditors and External Auditors, monitoring the audit work carried out and checking their independence. We have analysed the Statutory Auditors' Report and Auditors' Report, dated April 10th, 2026, which does not include any qualifications or emphasis and with which we agree.

4. The Audit Board analysed the proposals submitted to it for the provision of non-audit services by the Statutory Auditors Firm and approved those that concerned permitted services, did not affect the independence of the Statutory Auditors and complied with the other legal requirements.

5. Within the scope of our duties, we have verified that:

   a) The Separate Income Statement, the Separate Statement of Financial Position, the Separate Statement of Comprehensive Income, the Separate Statement of Changes in Equity, the Separate Statement of Cash Flows and the accompanying Notes to the Separate Financial Statements, provide an adequate understanding of the Company's financial position and results, comprehensive income, changes in equity, and cash flows;

   b) The accounting policies and valuation criteria adopted comply with the International Financial Reporting Standards (IFRS) as adopted in the European Union and are suitable to ensure that such criteria lead to a correct valuation of the Company's assets and results;

   c) The Management Report is sufficiently clear in explaining the business development and the situation of the Company, clearly highlighting the most significant aspects of the activity;

   d) The Corporate Governance Report includes the information required by Article 29.º-H of the Securities Portuguese Code and has taken into account the recommendations of the Code of the Portuguese Institute for Corporate Governance (IPCG).

6. We are of the opinion that the proposed application of profits presented by the Board of Directors satisfies the requirements of the applicable legal and statutory provisions.

7. Accordingly, taking into consideration the information received from the Board of Directors and the Company departments, and the conclusions of the Statutory Auditors' Report and Auditors' Report, we recommend that:

   a) The Management Report be approved;

   b) The Separate Financial Statements be approved;

   c) The proposal for the application of profits presented by the Board of Directors be approved.

Finally, the members of the Audit Board wish to thank the Board of Directors, managers and other staff of the Company, as well as the Statutory Auditors Firm, KPMG & Associados, SROC, S.A. for their collaboration and support in carrying out our work.

Lisbon, 10th April 2026

The Chair of the Audit Board

Maria da Luz Gonçalves de Andrade Campos

Member

José Manuel Oliveira Vitorino

Member

Jorge Manuel Araújo de Beja Neves

ANNUAL REPORT 2025

Corporate Governance

Part I
Information on Shareholder Structure, Organisation and Corporate Governance

A. Shareholder structure

I. Capital structure

1. Capital structure (share capital, number of shares, capital distribution among shareholders, etc.), including indication of shares not admitted to trading, different categories of shares, rights and duties attached to the same, and the percentage of the capital represented by any such category (article 29-H, no. 1, para. a) of the CVM).

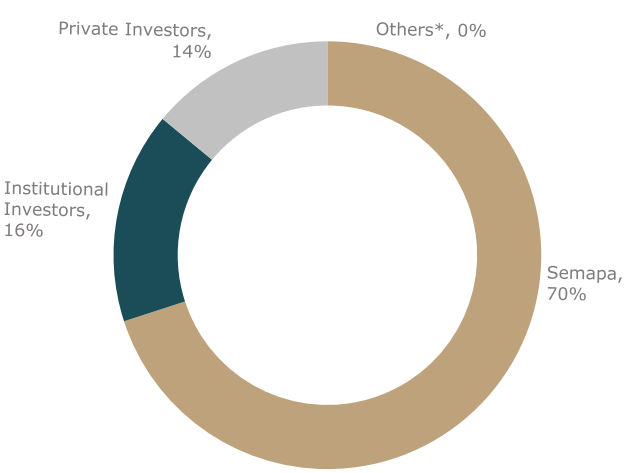
The Navigator Company, S.A. has a share capital of Euro 500,000,000, fully paid up, represented solely by 711,183,069 ordinary shares, without nominal value, the same rights and duties being attached to all shares.

All shares representing the Company's share capital are listed on the regulated Euronext Lisbon market, managed by Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A.

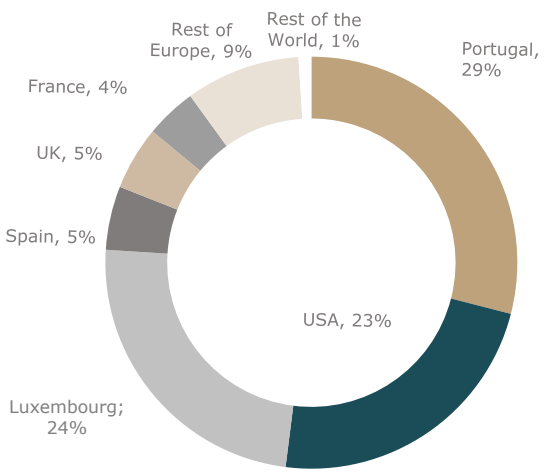
At the end of 2025, the Company carried out a new analysis of its shareholder base, identifying and characterising its main institutional shareholders. In addition to the Semapa Group, the majority shareholder with 70% of Navigator's share capital, about 180 institutional shareholders were identified and characterised, representing about 16% of the shares issued.

Thus, in December 2025, the shareholder composition identified was as follows:

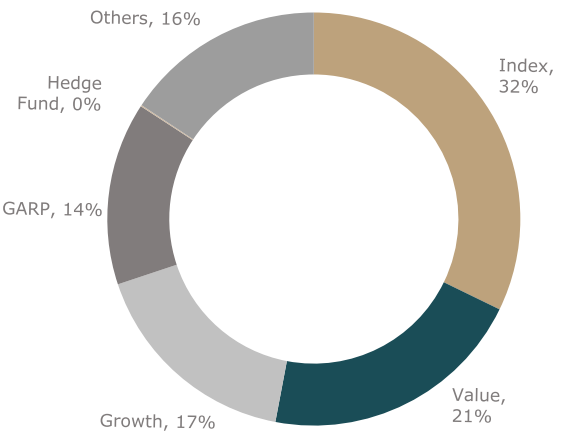
Shareholders Composition



Shareholders by Geography (Institutional)



Shareholders by Investment Style (Institutional)



In addition to the majority shareholder's stake, by the end of 2025, Navigator's institutional shareholders were predominantly based in Europe, with Portugal-based institutional shareholders representing the largest share (29%), followed by those based in the United States of America (USA), accounting for 23%.

In addition, in terms of investment style characterisation, approximately 32% of shares were held by Institutional Investors pursuing an Index fund strategy, 21% by Investors with a Value-oriented strategy, 17% by Investors with a Growth strategy, and approximately 14% by Investors employing a GARP (Growth at Reasonable Price) strategy.

2. Restrictions on the transferability of shares, such as consent clauses for disposal, or limitations on ownership of shares (Art. 29-H, no. 1, para. b) of the CVM).

The shares representing Navigator's share capital are freely transferable.

3. Number of treasury shares, corresponding percentage of share capital and percentage of voting rights which would correspond to treasury shares (Art. 29-H, no. 1, para. a) of the CVM).

As of 31 December 2025, Navigator did not hold any treasury shares.

4. Significant agreements to which the Company is a party and which take effect, are amended or terminate in the event of a change in the control of the Company as a result of a takeover bid, together with the respective effects, unless, due to its nature, disclosure of such agreements would be seriously detrimental to the Company, except if the Company is specifically required to disclose such information by other mandatory provisions of law (Art. 29-H, no. 1, para. j) of the CVM).

1. Navigator is not a party to any agreements providing for payments, compensation or the assumption of costs as a consequence of changes in the composition of the Board of Directors.

2. The financing agreements currently in force, the amounts of which are expressly disclosed in the Company's annual financial statements included in the Annual Report of which this Report forms part, contain customary change of control clauses relating to the majority shareholder, Semapa - Sociedade de Investimento e Gestão, SGPS, S.A.

Under the terms of such clauses, the lending entities are entitled to declare the early maturity of the relevant financing facilities in the event of a change of control of Navigator; however, such acceleration does not occur automatically and is contingent upon an express decision by the lenders.

These clauses do not, in and of themselves, give rise to any automatic payments, nor do they entail the assumption of additional costs by the Company. They solely confer upon the respective lenders a contractual protection mechanism against material changes in the borrower's risk profile.

3. Change of control clauses are a widespread and standard practice in both domestic and international financial markets, and are customarily included in various financing instruments, including bond issuances, commercial paper programmes, loan agreements and revolving credit facilities.

Such mechanisms are common among companies of Navigator's size, nature and business profile, reflecting well-established financial market practices and, as a rule, constituting a necessary condition for entering into financing agreements, notably for prudential reasons and counterparty oversight purposes within the context of ongoing credit risk assessment.

Their sole purpose is to enable the lender to reassess the risk assumed in the event of a significant change in the shareholder structure. They do not constitute defensive corporate mechanisms (poison pills) nor restrictions on the transferability of shares. The agreements do not prevent the transfer of shares; they merely afford the lender the possibility of renegotiating or, as a last resort, terminating the contractual relationship, should it consider that a material change in the assumed risk has occurred. They therefore do not affect the normal functioning of the market or the free transferability of the Company's shares.

4. The Company considers that these clauses are not significant by nature or amount, having regard to its financial position and conservative risk profile, as reflected in its Net Debt/EBITDA ratio of 1.87x.

Over the past ten years, this ratio has never exceeded 2.0x, demonstrating a moderate level of leverage consistent with a prudent financial policy. In this context, whilst the possibility of the early maturity clauses being exercised cannot be theoretically excluded, the Company considers the likelihood of such an occurrence arising solely from a change of control to be remote.

5. The Company also maintains adequate liquidity levels, resulting from a combination of available cash resources and committed undrawn credit facilities, as well as a diversified maturity profile across its funding sources. These circumstances enable the Company to absorb any potential impacts arising from a hypothetical early maturity scenario, with no material disruption to the Company's operations or financial position being expected.

Any potential change of control transaction - the occurrence of which is not contemplated, and is considered solely for the purposes of compliance with Recommendation III.7 - would necessarily be conducted with due regard to the Company's financial and operational stability, as well as the predictability and adequate safeguarding of the interests of investors and other stakeholders.

In light of the foregoing, the Company considers that:

a) no measures have been adopted that would give rise to payments or costs associated with changes in the composition of the Board of Directors;

b) the change of control clauses contained in the financing agreements reflect standard market practices and do not constitute defensive corporate mechanisms; and

c) such clauses are not capable of (i) prejudicing the economic interest in the transfer of Navigator's shares, (ii) influencing shareholders' independent assessment of the performance of the Directors, (iii) affecting the normal formation of the share price in the market, or (iv) giving rise to material disruption in a change of control scenario.

The Company therefore considers that it has fully complied with Recommendation III.7 of the IPCG Corporate Governance Code.

5. Rules applicable to the renewal or revocation of defensive measures, in particular those providing for limits on the number of votes which can be held or cast by a single shareholder individually or in a concerted manner with other shareholders.

The Company has not adopted any defensive measures, and in particular none that provide for the limitation of the number of votes that may be held or exercised by a single shareholder, whether individually or in concert with other shareholders.

6. Shareholders' agreements known to the Company or which might lead to restrictions on the transfer of securities or voting rights (Art. 29-H, no. 1, para. g) of the CVM)

The Company is not aware of the existence of any shareholders' agreement that could give rise to restrictions on the transfer of securities or on voting rights.

Shareholding and Bondholding positions

7. Identification of persons and organisations who, directly or indirectly, own qualifying holdings (articles 29-H, no. 1, para. c) and d) and 16 of the CVM), detailing the attributable percentage of the share capital and votes and the respective grounds.

The holders of qualifying holdings in Navigator on 31 December 2025 are those identified in the table below:

Holder	Atrribution	N.º shares	% capital and voting rights
Filipa Mendes de Almeida de Queiroz Pereira (Filipa Queiroz Pereira), Mafalda Mendes de Almeida de Queiroz Pereira (Mafalda Queiroz Pereira), Lua Mónica Mendes de Almeida de Queiroz Pereira (Lua Queiroz Pereira)	Together, through companies directly and indirectly owned and described below, in conjunction with parasocial agreement that they entered into — in respect of shareholdings in the companies holding Semapa - Sociedade Investimento e Gestão, SGPS, S.A shares.		—
Target One Capital, S.A.	Majority-owned by Filipa Queiroz Pereira; holds 21.56% of the share capital of Sodim, SGPS, S.A. (Sodim)	—	—
Keytarget Investments - Consultoria e Investimentos, S.A.	Majority-owned by Mafalda Queiroz Pereira; holds 21.56% of the Sodim share capital	—	—
Premium Caeli, SA	Majority-owned by Lua Queiroz Pereira; holds 21.56% of Sodim, SGPS, S.A share capital	—	—
Sodium, SGPS, S.A.	Indirectly dominated by Filipa Queiroz Pereira, Mafalda Queiroz Pereira and Lua Queiroz Pereira; holds 100% of the share capital of CIMO - Gestão de Participações, SGPS, S.A.(Cimo);	—	—
Cimo - Gestão de Participações, SGPS, S.A.	Indirectly dominated by Filipa Queiroz Pereira, Mafalda Queiroz Pereira and Lua Queiroz Pereira and directly by Sodim;	—	—
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Indirectly dominated by Filipa Queiroz Pereira, Mafalda Queiroz Pereira and Lua Queiroz Pereira and directly by Sodim e Cimo; direct ownership of shares in The Navigator Company	498,042,299	70.030%
			70.030%

8. Indication of the number of shares and bonds held by members of the management and supervisory bodies.

This information is provided in Annex I of Part II of this Report.

9. Special powers of the management board, in particular concerning resolutions to increase capital (article 29-H (1) para. (i) of the CVM) indicating, with regard to these, the date on which they were granted, the period during which such powers may be exercised, the upper limit for the increase in share capital, shares already issued under the powers granted and the manner in which the powers granted are implemented.

The Articles of Association do not authorise the Board of Directors to pass resolutions approving capital increases.

10. Information on the existence of significant dealings of a commercial nature between holders of qualifying holdings and the Company.

All the transactions that took place in 2025 between the Company and the holders of qualifying holdings are described in Note 11.3 of the Notes to the consolidated financial statements and Note 10.2 of the Notes to the individual financial statements. There were no significant commercial relationships between the holders of qualifying holdings and the Company in 2025 - due to the application of the Regulation on Conflicts of Interest and Transactions with Related Parties and under the terms and conditions set out therein at any given time, as described in paragraphs 89 et seq. of this Report.

B. CORPORATE BODIES AND COMMITTEES

I. GENERAL MEETING

a) Composition of the Board of the General Meeting*

*Throughout the reference year

11. Officers of the Board of the General Meeting and their term of office (starting and ending dates).

The officers of the Board of the General Meeting are:

- Chairman: Rui Manuel Pinto Duarte (mandate from 17/05/2023 to 31/12/2025).

- Secretary: Luís Nuno Pessoa Ferreira Gaspar (mandate from 17/05/2023 to 31/12/2025).

b) Exercise of voting rights

12. Any restrictions on voting rights, such as limitations on the exercise of voting rights based on the ownership of a given number or percentage of shares, time limits for exercising voting rights, or systems for detaching voting rights from ownership rights (Art. 29-H, no. 1, para. f) of the CVM).

In the Company, the Shareholders are not subject to any restrictions on the exercise of voting rights.

The Company's Articles of Association were amended at the annual general meeting held in 2022, introducing changes aimed at bringing the statutory provisions into closer alignment with applicable law, on the one hand, and at reinforcing good corporate governance practices, on the other. Accordingly, the statutory rules governing voting rights provide for the following:

1. Shareholders with voting rights are entitled to attend the General Meeting. Attendance at the General Meeting and the exercise of voting rights is subject to proof of shareholding status with voting rights as at 00:00 hours (GMT) on the 5th (fifth) trading day prior to the date of the General Meeting. Each share in the Company carries one vote.

2. The exercise of voting rights by postal correspondence or by electronic means is permitted. The Chairman of the General Meeting shall verify the authenticity and regularity of such votes and ensure their confidentiality until the time of the vote, subject to the following:

   a) Voting declarations must be addressed to the Chairman of the General Meeting and received at the Company's registered office no later than the day preceding the General Meeting;

   b) In the case of voting by electronic means, the email addressed to the Chairman of the General Meeting must include, as an attachment, a document in PDF format, signed in accordance with the signature on the holder's valid identification document, setting out the voting declarations in respect of each item on the agenda, together with a copy of the holder's identification document. The Chairman of the General Meeting may establish, in the notice convening the relevant meeting, an alternative regime to that set out in this paragraph, provided that it ensures equivalent security and reliability;

   c) In the case of voting by postal correspondence, the envelope must contain a letter addressed to the Chairman of the General Meeting, duly signed in accordance with the signature on the holder's valid identification document, setting out the voting declarations in respect of each item on the agenda, together with a copy of the holder's identification document; and

   d) Votes cast by these means shall be counted together with the votes expressed at the General Meeting, and shall be deemed to constitute votes against any proposals submitted after the time of their casting.

3. The General Meeting may be held by telematic means whenever such proves appropriate and convenient, provided that the Chairman of the General Meeting confirms that the necessary means, the authenticity of declarations and the security of communications are duly ensured for such purposes. The Company shall record the content of the meeting and the identity of the participants.

The Company's Annual General Meeting of 29 May 2025 was held in accordance with the statutory rules described above, and took place in person. The decision to hold the meeting in this format was made on the basis that it was considered to provide effective shareholder participation consistent with shareholders' rights, and in the absence of any requests to allow participation by telematic means. Further consideration was given to the administrative burden and costs associated with implementing an additional system to enable telematic participation alongside the in-person holding of the annual general meeting.

At the said General Meeting, certain shareholders exercised their voting rights by electronic correspondence in accordance with the Company's Articles of Association.

There are no preferential systems conferring rights of a patrimonial nature.

13. Indication of the maximum percentage of the voting rights which can be exercised by a single shareholder or by shareholders connected in any of the forms envisaged in article 20 (1).

There are no statutory provisions establishing that voting rights above a certain number shall not be counted when cast by a single shareholder or by shareholders related to such shareholder.

14. Identification of shareholder resolutions which, under the Articles of Association, can only be adopted with a qualified majority, in addition to those provided for by law, and details of the majorities required.

The Company has no quorum requirements for the convening or passing of resolutions that differ from the applicable statutory default rules.

II. MANAGEMENT AND SUPERVISION (Board of Directors, Executive Committee and General and Supervisory Board)

a) COMPOSITION*

15. Identification of the governance model adopted.

The Company has adopted in its Articles of Association, a one-tier governance model, consisting of (a) a Board of Directors, composed of executive and non-executive Directors, and (b) a Statutory Audit Board and a Statutory Auditor, in accordance with the provisions of paragraph a) of Article 278(1) and paragraph b) of Article 413(1) of the Portuguese Companies Code.

16. Rules in the Articles of Association on procedural and material requirements applicable to the appointment and replacement of members, as the case may be, of the Board of Directors, the Executive Committee and the General and Supervisory Board (article 29-H, no. 1, para. h) of the CVM). Diversity Policy.

The Company's Articles of Association do not currently contain any special rules governing the appointment and replacement of Directors. In this regard, the general default regime set out in the Portuguese Companies Code applies, whereby the power to appoint Directors (between three and seventeen in number), as well as the members of the Supervisory Body, vests in the shareholders.

The Articles of Association do, however, provide that a Director may be elected individually where proposals are submitted and signed by groups of shareholders, provided that none of those groups holds shares representing more than twenty per cent or less than ten per cent of the share capital. Where proposals are submitted on such terms, the election shall be conducted separately and prior to the election of the remaining Directors. The same shareholder may not subscribe to more than one list. Each proposed list must identify at least two eligible candidates. Where lists are submitted by more than one group, the vote shall be taken on all such lists collectively.

The Company has approved the following Diversity Principles, which set out the requirements and criteria applicable to the profile of new members of the corporate bodies and senior management:

- Inclusion of individuals with distinct academic qualifications and professional experience across diverse areas, appropriate and relevant to the role to be performed;
- Promotion of gender diversity;
- Inclusion of individuals of varying ages, combining acquired experience with fresh perspectives; and
- Inclusion of individuals with diverse geographical backgrounds or experiences.

These Principles are published on the Company's website (https://en.thenavigatorcompany.com/Investors/Governance).

The Diversity Principles represent the Company's formal recognition of the benefits of diversity within its corporate bodies, notably as a means of ensuring a more balanced composition, enhancing the performance of each individual member and, collectively, of each body, improving the quality of decision-making processes and contributing to the Company's sustainable development.

In keeping with this commitment, and in order to promote diversity within the Company, the Company has acknowledged that, in addition to individual attributes such as competence, independence, integrity of character, availability and experience, other diversity requirements and criteria are also relevant to the composition of its corporate bodies and senior management positions. These include gender diversity, distinct academic qualifications and professional experience, the inclusion of members of different ages, and individuals with diverse geographical backgrounds or origins.

In this regard, the competency matrix set out below demonstrates a considerable degree of diversity across its various dimensions with respect to the members of Navigator's Board of Directors:

Skills Matrix

	Genus	Year of birth	Position	Engineering	Economy	Management	Other areas of study	Business Management and Administration	Governance	Mergers & Acquisitions	Internal Expansion	Academic	Talent Management	Research and Development	Information Technologies	Sustainability*	Pulp and paper	Energy	Industry
Ricardo Pires	M	1976	PCA			●	●	●	●	●	●	●	●			●	●	●	●
António Redondo	M	1964	CEO	●		●	●	●	●	●	●	●		●		●	●	●	●
Fernando Araújo	M	1964	CFO			●	●	●	●	●	●	●			●	●	●		●
Nuno Santos	M	1970		●		●		●	●	●	●			●		●	●	●	●
João Lé	M	1963		●		●	●	●			●			●		●	●	●	●
Dorival Almeida	M	1966		●		●	●	●	●		●		●	●	●	●	●	●	●
António Quirino Soares	M	1974			●	●		●			●	●		●			●		●
Ana Lehmann	F	1972			●	●		●		●	●	●		●	●	●		●	●
Hugo Pinto	M	1978		●		●	●	●		●		●	●		●				●
Isabel Viegas	F	1958					●					●	●	●		●			
Mariana Marques dos Santos	F	1966				●		●	●		●	●	●		●				
Sandra Santos	F	1971			●	●		●		●	●	●	●			●		●	●
Teresa Presas	F	1952					●	●	●	●	●					●	●		●
Vítor Paranhos Pereira	M	1957			●			●	●	●	●		●		●	●			

* Includes competencies for the supervision of strategy, management of impacts, risks and opportunities, good practices and certification on topics related to (i) sustainable forest management and biodiversity conservation; (ii) climate action and energy; (iii) water management; (iv) circular economy; (v) people management; (vi) innovation, development and bioproducts; and (vii) value chain.

Table in context in section 16 of the Corporate Governance Report | Part I – Information on Shareholder Structure, Organisation and Governance of the Company

The Company also has a Talent Committee, an advisory body with responsibilities in relation to the nomination of members of the corporate bodies, including competencies to support the identification of potential members of the corporate bodies and the assessment of each candidate's suitability for the role to be performed. The Talent Committee is tasked with promoting transparent selection processes and ensuring that the candidates proposed are those of greatest merit, best suited to the requirements of the role, and who advance appropriate diversity within the organisation, including with respect to gender, age and professional experience. The Company therefore considers that all objectives arising from the formal adoption of a diversity policy have been achieved, as is also demonstrated in practice.

It should further be noted that, in furtherance of its commitment to diversity, the Company approved in 2025 the Equality Plan 2026, reflecting progress relative to the previous Equality Plan 2025 approved in 2024, and communicated that Plan to the Portuguese Securities Market Commission (CMVM). The Plan is also published on Navigator's website (https://thenavigatorcompany.com/wp-content/uploads/2025/12/Plano-para-Igualdade_The-Navigator-Co_2026_PT.pdf).

17. Composition, as the case may be, of the Board of Directors, the Executive Committee and the General and Supervisory Board, detailing the provisions of the Articles of Association concerning the minimum and maximum number of directors, duration of term of office, number of full members, and the date when first appointed and the end of their terms of office for each member.

The Company's Articles of Association stipulate that the Board of Directors comprises three to seventeen members (article 15 no. 1), elected for three-year, renewable terms (article 8 no. 3).

The date of the first appointment and the end of the term of office are individualised for each member:

Name	Date of first appointment and end of term in office
Ricardo Miguel dos Santos Pacheco Pires	2015-2025
António José Pereira Redondo	2007-2025
Nuno Miguel Moreira de Araújo Santos	2015-2025
José Fernando Morais Carreira de Araújo	2007-2025
João Paulo Cabete Gonçalves Lé	2020-2025
Dorival Martins de Almeida	2023-2025
António Quirino Vaz Duarte Soares	2023-2025
Ana Teresa Cunha de Pinho Tavares Lehmann	2023-2025
Hugo Alexandre Lopes Pinto	2023-2025
Maria Isabel da Silva Marques Abranches Viegas	2023-2025
Maria Teresa Aliu Presas	2019-2025
Mariana Rita Antunes Marques dos Santos	2019-2025
Sandra Maria Soares Santos	2019-2025[68]
Vítor Paulo Paranhos Pereira	2020-2025

The composition of the Board of Directors is freely available for consultation on the Company's website at https://en.thenavigatorcompany.com/Investors/Governance.

18. Distinction between executive and non-executive members of the Board of Directors and, in relation to non-executive directors, identification of those who can be regarded as independent or, if applicable, identification of the independent members of the General and Supervisory Board.

(A) Executive and non-executive Directors; identification of independent directors

During the 2025 financial year, and up to the reference date of this Report, the Board of Directors was composed of Executive and non-executive Directors. Six members performed executive functions as members of the Executive Committee elected by the

[68] Cessation by resignation with effect from 31 March 2025.

Board of Directors, to which the relevant powers were delegated. Those members are identified below, at point 28, with the remaining members performing non-executive functions.

With effect from 31 March 2025, the Board of Directors came to comprise seven non-executive Directors, following the cessation of duties, by resignation, of non-executive Director Sandra Santos. Accordingly, at the beginning of the 2025 financial year, non-executive Directors represented 57.1% of the members of the Board of Directors, a proportion which decreased to 53.8% for the remainder of the financial year. The Company considers both percentages to be appropriate to its size and to the complexity of the risks inherent in its business, as well as sufficient to ensure the efficient discharge of the functions entrusted to non-executive Directors.

This assessment of adequacy took into account, in particular, the size of the Executive Committee and the powers delegated to it by the Board of Directors, the profile, age, professional background and experience and integrity of the members of that body, the range of diversified competencies and the availability of non-executive Directors to perform their duties, which, through the close cooperation developed with the Chairman of the Board of Directors and the members of the Executive Committee, ensure an effective capacity to monitor, supervise and evaluate the activities of the executive members of the Board of Directors, the Company's activities, its family-controlled nature and the stability of its shareholder capital structure.

The members of the Corporate Bodies for the current mandate were elected at the annual General Meeting held on 17 May 2023, for the 2023-2025 three-year term. At that General Meeting, Ana Teresa Cunha de Pinho Tavares Lehmann, Maria Teresa Aliu Presas, Mariana Rita Antunes Marques dos Santos and Sandra Maria Soares Santos were elected as independent non-executive Directors. As a result, the Company had four independent Directors in office until 31 March 2025, the date on which Sandra Maria Soares Santos ceased her duties by resignation, since which time the Company has had three independent Directors in office.

Accordingly, at the beginning of the 2025 financial year, independent Directors represented 50% of the $$ Directors, a proportion which decreased to 42.9% of non-executive Directors for the remainder of the financial year, remaining in both cases above one third of the non-executive Directors, in accordance with the independence assessment criteria set out in Recommendation IV.2.4 of the IPCG Corporate Governance Code.

The remaining non-executive Directors, whilst not independent in accordance with the criteria referred to above, possess the requisite probity, experience and proven professional competence, which serves to enrich and optimise the Company's management from a value creation perspective, as well as to ensure the effective protection of the interests of all shareholders and to guarantee the oversight and evaluation of the activities of the executive Directors in an impartial, unbiased, independent and objective manner, whilst simultaneously ensuring the absence of conflicts of interest between the interests and position of the shareholder and the Company.

(B) Coordination mechanism which is equivalent to the appointment of a Lead Independent Director

As the Chairman of the Board of Directors is not independent, and having regard to the specific characteristics of the Company, namely its family-controlled nature and the concentration of its capital structure, the total number of non-executive Directors and, amongst these, the number of independent Directors, as well as the characteristics and current position of the Chairman of the Board of Directors, the Company has chosen to establish a mechanism to ensure coordination amongst the various members of the Board of Directors.

In practice, and as already set out in this Report, the Company has established various rules and procedures that enable close and regular coordination amongst the various members of the Board of Directors, in particular between the Chairman and the remaining Directors, and that ensure the necessary conditions and means for the performance of their duties in an independent, informed and efficient manner, thereby guaranteeing the oversight and supervisory function in relation to executive management.

In this regard, we highlight the various mechanisms set out in the Regulations of the Board of Directors and of the Company's various internal committees, pursuant to which:

(a) Members of the Board of Directors, including non-executive members, may have access to all information necessary for the assessment of the Company's performance, situation and development prospects, including, in particular, the minutes, supporting documentation for decisions taken, notices of meeting and archives of the meetings of the other Corporate Bodies, without prejudice to access to any other documents or persons from whom clarifications may be requested;

(b) The Chairman of the Board of Directors shall inform the Company's Directors, at the beginning of each Board of Directors meeting, of the most significant resolutions and acts carried out by the Executive Committee since the previous meeting, to the extent not already known to the remaining Directors;

(c) Minutes shall be drawn up of all Executive Committee meetings, which shall be kept by the Company Secretary and made available to any member of the Board of Directors upon request;

(d) The Chief Executive Officer shall, to the extent possible, promote the involvement of non-executive Directors in specific projects and acts, so as to enable greater monitoring and closer engagement of non-executive Directors with the Company's activities, having regard to the matters at hand and the specific qualifications and preferences of each member;

(e) All Executive Directors shall be available to provide such clarifications and information as may be requested by the non-executive Directors;

(f) The Chairman of each of the Company's internal committees shall inform the Board of Directors of the resolutions of the committee of which they form part that, given their significance, should be brought to its attention. In the case of the Executive Committee, this responsibility falls to the Chief Executive Officer;

(g) All members of the Company's internal committees shall be available to provide such clarifications and information as may be requested by the remaining Directors;

(h) Supporting documents relating to the various items on the agenda of meetings of the Board of Directors and of the Company's internal committees shall be distributed to all Directors sufficiently in advance to allow for their timely review, preferably together with the notice convening the meeting.

Additionally, at least three non-executive Directors are members of the Talent Committee - with the Chairman of the Board of Directors also serving as Chairman of the Talent Committee and of the Corporate Governance Committee - thereby reinforcing the coordination and performance of the work of the members with non-executive functions.

The Company has accordingly established a mechanism for the coordination of non-executive Directors equivalent to that which would exist were a Lead Independent Director to be appointed.

19. Professional qualifications and other relevant biographical details of each member, as applicable, of the Board of Directors, the General and Supervisory Board and the Executive Committee.

Ricardo Miguel dos Santos Pacheco Pires

Ricardo Pires holds a degree in Business Administration and Management from Universidade Católica Portuguesa, a specialisation in Corporate Finance from ISCTE and an MBA in Business Management from Universidade Nova de Lisboa. He began his career in management consulting between 1999 and 2002, initially at BDO Binder and subsequently at GTE Consultores. From 2002 to 2008, he worked in the Corporate Finance Division of ES Investment, where he executed various M&A and capital markets projects in the Energy, Pulp and Paper, and Food & Beverages sectors. He has been with Semapa since 2008, initially as Director of Strategic Planning and New Business and subsequently, from 2011 onwards, as Chief of Staff to the Chairman of the Board of Directors. In 2014, he was appointed Executive Director of Semapa and, in 2022, Chief Executive Officer, a position he held until

May 2025, at which point he was appointed Managing Director of that company. He also holds positions in other companies related to Semapa. Since 2015, he has held non-executive board positions at The Navigator Company and Secil, having assumed the role of Chairman of the Board of Directors of both companies in 2022. In 2017, he was appointed CEO of Semapa Next, assuming the role of Chairman of the Board of Directors of that company in 2022. Between 2020 and 2025, he served as Chairman of the Board of Directors of Grupo ETSA and, in 2023, was appointed Chairman of the Board of Directors of Triangle's. Between 2020 and 2022, he lectured on the Master in Finance programme at Universidade Católica de Lisboa.

António José Pereira Redondo

António Redondo holds a degree in Chemical Engineering from the Faculty of Sciences and Technology (FCT) of the University of Coimbra, attended a Business Management course and holds an MBA with a specialisation in Marketing from Universidade Católica Portuguesa. He joined Soporcel in 1987, where he held various positions in the technical, production, marketing and commercial management areas. He has been a member of the Board of Directors and Executive Committee of The Navigator Company since April 2007, having served as Chief Commercial Officer from 2007 to 2019, with responsibilities across Marketing, Sales, Revenue Management, Supply Chain, Logistics and Product Development. In 2020, he was appointed CEO of the Company. He also serves as Chairman of Biond – Forest Fibers from Portugal, Director of CIP (Confederação Empresarial de Portugal), member of the Boards of CEPI (Confederation of European Paper Industries) and Euro-Graph (European Association of Graphic Paper Producers), Member of the Board of AmCham Portugal (American Chamber of Commerce in Portugal), Member of the Academy of Engineering, Associate Visiting Professor in the Department of Chemical Engineering at FCT of the University of Coimbra and Visiting Professor in the Department of Materials Science at FCT of Universidade Nova de Lisboa.

José Fernando Morais Carreira de Araújo

Fernando Araújo holds a law degree from Universidade Lusíada do Porto (2000), a bachelor's degree in Accounting and Administration from the Porto Institute of Accounting and Administration (ISCAP – 1986) and a Higher Specialised Studies qualification in Financial Control from the same institution (1992). He has been a Statutory Auditor (*Revisor Oficial de Contas*) since 1995 and a Certified Accountant (*Contabilista Certificado*) since 1987. He has served as Vice-Chairman of the General Meeting Board of Biond – Forest Fibers from Portugal since 2022. He has been a member of the Supervisory Board (*Conselho Fiscal*) of the Portuguese Institute of Statutory Auditors (*Ordem dos Revisores Oficiais de Contas*) since January 2021 and a member of the Board of the Portuguese Tax Association (*Associação Fiscal Portuguesa*) since 2019. He holds postgraduate qualifications in Advanced Financial Accounting (ISCTE – 2002/2003), in Tax Law from the Lisbon Faculty of Law (FDL – 2002/2003) and in Corporate Governance from the Lisbon School of Economics and Management (ISEG – 2006/2007). He completed an MBA in Corporate Reporting at ISCTE – IUL in 2016. He began his professional career in 1987 at Sportrade, subsequently serving as Head of Accounting at Eurofer between 1988 and 1993, and as Head of Administrative Services at COLEP from 1991 to 1993. Between 1993 and 2001, he worked in the tax area at KPMG, where he rose to the position of Senior Tax Manager. He served as Director of Tax and Accounting at Secil between 2001 and 2005, at Semapa between 2002 and 2006, and at the Company between 2006 and 2007. He has been an Executive Director of the Company since April 2007.

Nuno Miguel Moreira de Araújo Santos

Nuno Santos holds a degree in Civil Engineering from Instituto Superior Técnico (1993) and an MBA from INSEAD (1996). He began his professional career at McKinsey & Company in 1993 and, until March 2015, was Senior Partner and leader of the Energy, Commodities & Industry Practice of McKinsey's Iberia Office. He was also a member of the Leadership Committee of the Global Energy, Commodities & Industry Practice. He assumed the role of Executive Director of The Navigator Company in April 2015, where he has held the following portfolios: Tissue Business, Pulp Sales, Energy, RAIZ, and Business Development (current portfolios); and Forestry, Wood Supply, Procurement, the Mozambique Project, and Pellets Business (past portfolios). He is currently Chairman of APIGCEE (Portuguese Association of Large Electricity Consumer Industries).

João Paulo Cabete Gonçalves Lé

João Lé holds a degree in Agronomy, specialising in Agricultural Economics, from the Instituto Superior de Agronomia (ISA) of the Universidade Técnica de Lisboa, a postgraduate qualification in Silviculture of Fast-Growing Species from ISA and the University of Trás-os-Montes e Alto Douro, and a postgraduate qualification in Management, with a specialisation in Finance, from ISCTE, Universidade de Lisboa. He has been with the Navigator Group for approximately 30 years, having assumed responsibility for the Forestry Area in August 2007 and, in July 2016, was appointed CEO of Portucel Moçambique, responsible for the project to implement a forest-based industry in Mozambique through DUATs (areas allocated by the government), covering approximately 360,000 hectares across two provinces. He has been an Executive Director of the Company since January 2020.

Dorival Martins de Almeida

Dorival Almeida holds a degree in Chemical Production Engineering from the Universidade Federal de São Carlos, a postgraduate qualification in Business Management from the Fundação Armando Álvares Penteado, a specialisation in Quality Engineering from the Universidade Estadual de Campinas, a postgraduate qualification in Production Management from the Universidade Federal de São Carlos, a postgraduate qualification in Pulp and Paper Technology from the Universidade Federal de Viçosa, a postgraduate qualification in People and Talent Management from the University of Coimbra, and an MBA in Business Management from the Fundação Getúlio Vargas. He worked at Votorantim Celulose e Papel from 1992 to 2007, at International Paper between 2007 and 2019, and at CMPC between 2019 and 2021. He joined Navigator in 2021 as Industrial Director of the Figueira da Foz Mill. He assumed the role of Executive Director of The Navigator Company in April 2023.

António Quirino Vaz Duarte Soares

António Quirino Soares holds a degree in Business Management from the University of Coimbra, and a Master's degree in Economics from the University of Exeter, United Kingdom. He joined The Navigator Company in 2001, where, over 13 years, he held various roles in the Sales and Marketing areas. This was followed by the position of Marketing Director, for five years, during which he drove the international presence of the house brands. Before joining the Executive Committee, Quirino Soares served as Supply Chain Director, a role in which he managed the logistical challenges arising from the global disruptions of the pandemic period. António Quirino Soares has been a member of the Board of Directors and the Executive Committee of The Navigator Company since 1 August 2023. He is an Executive Director with responsibility for Logistics, Marketing, Supply Chain, Product Technology, European Sales, International Sales, E-Commerce, Moulded Pulp, Packaging and Pricing.

Ana Teresa Cunha de Pinho Tavares Lehmann

Ana Lehmann holds a degree in Management from FEP – University of Porto, and a Master's degree and PhD in Economics (International Business) from the University of Reading (United Kingdom). She is a non-executive member of the Board of Directors of TAP – Transportes Aéreos Portugueses, S.A., BCR – Brisa Concessão Rodoviária, S.A., and Futebol Clube do Porto – Futebol SAD, and Chair of the Board of Directors of the Iberian group Zolve-Logística e Transporte, S.A. She chairs the Supervisory Board of Vieira de Castro-Produtos Alimentares, S.A., the Finance, Audit and Risk Committee of TAP S.A., and serves as Chairperson of the Board of the European International Business Academy. She is a member of the Advisory Board of Orkestra – Basque Competitiveness Institute, the University of Fribourg Competitiveness Institute, Vibe Capital Partners, the Strategic Council for the Digital Economy (CIP), and the Advisory Board of AEP – Associação Empresarial de Portugal, and collaborates regularly with various international organisations. She served as Secretary of State for Industry in the XXI Constitutional Government of Portugal. She is a Professor at FEP – University of Porto and has taught and conducted research at several European and American universities, including Columbia University of New York, Glasgow, Reading, and Uppsala, in the areas of Foreign Direct Investment, Internationalisation, and Innovation. She has previously served as Vice-President of CCDR-N, Chair of the Managing Authority of the European Union's Atlantic Area Programme, Pro-Rector of the University of Porto, Chair of the Investment Committee of the Social Innovation Fund, Chair of the General Council of the Fund of Funds for Internationalisation, and member of the Supervisory Board of the European Institute of Innovation and Technology (EIT) Manufacturing. She supported the founding of API – Agência Portuguesa para o Investimento and InvestPorto. She joined Navigator in May 2023 as a non-executive Director.

Hugo Alexandre Lopes Pinto

Hugo Pinto holds a degree in Civil Engineering from Instituto Superior Técnico, an Executive Master's in Real Estate Management and Finance and a Master's in Finance from ISCTE - Instituto Universitário de Lisboa, and an MBA from INSEAD. Between 2001 and 2007, he was a Structural Engineer and project manager at J. L. Câncio Martins - Projecto de Estruturas, Lda. From 2007 to 2013, he served as project manager at Sonagi. From 2018 to 2020, he was a director and member of the Investment Committee of Semapa Next, S.A. Since March 2013, he has held various positions within the Semapa Group, having served as Director of Planning and Strategic Development (07/2020–12/2021), Director of the CEO's Office (01/2019–06/2020), Deputy Director of the CEO's Office (04/2016–12/2018), Deputy Financial Director (11/2014–03/2016) and Deputy Director of Strategic Planning and New Business (03/2013–10/2014). He has been Chairman of the Board of Directors of ETSA - Investimentos, SGPS, S.A. since 2025, and serves as a director of Quotidian Podium, S.A., Aphelion, S.A., Ananke Nexus, S.A., Semapa Inversiones, S.L., Secil - Companhia Geral de Cal e Cimentos, S.A., Semapa Next, S.A., Capital Hotels – Soc. de Investimentos e Gestão, S.A. and Hotel Ritz, S.A. He is also a member of the Executive Management Committee of Semapa, a member of the Control and Risk Committee of Semapa, a member of the Advisory Board of Fundação Semapa - Pedro Queiroz Pereira, and a member of the Remuneration Committee of Sonagi, SGPS, S.A. He joined Navigator as a non-executive Director in May 2023.

Maria Isabel da Silva Marques Abranches Viegas

Maria Isabel Viegas holds a degree in Psychology from the Instituto Superior de Psicologia Aplicada (ISPA) and a Master's in Human Resources Policy and Management from ISCTE. She was at Marconi between 1990 and 1999, where she served as Head of Recruitment and Development Services (1990–1994), Head of Employment Relations and Social Policy (1995–1998) and Head of Senior Staff Management (June 1998–September 1999). From 1999 to 2003, she was at Jazztel as Human Resources Director. At Grupo Banco Santander Totta, from 2003 to 2017, she served as Coordinating Director of Human Resources of the Santander Group and as a Director of Santander Pensões. Between 2018 and 2021, she undertook consulting activities: she served as adviser to certain companies within the scope of ECS Capital (Grupo Montalva, Vale de Lobo, Moretextile) and of Semapa, in the area of Talent; she carried out consulting projects in Strategic Human Resources Management (including Grupo Montellano, Grupo Pestana, Infraestruturas de Portugal) and also served as a mentor to senior executives at various companies and, on a pro bono basis, in the PWN Mentoring Programme, supporting young women executives. She is also a lecturer at Católica Lisbon School of Business and Economics, with regular teaching activity, notably in Executive Masters programmes and executive education, where she has taught and coordinated various programmes since 2006. She was recognised with the Career Award in 2017, within the scope of the RH 2017 Awards, by the IIRH. She is also dedicated to philanthropic activities, as co-founder and member of the Board of Associação dNovo (since 2020), an organisation that supports highly qualified professionals aged over 50 who are unemployed. She joined the Semapa Group in January 2022 as Chief People Officer, member of the Executive Management Committee and member of the Talent Committee of Semapa, a position she held until May 2025. She served as a non-executive Director and member of the Remuneration Committee at Secil until July 2025. Also until July 2025, she served as a Director of Semapa Next, member of the Remuneration Committee of Semapa Next, member of the Remuneration Committee of ETSA Investimentos, member of Quotidian Podium and member of the Remuneration Committee of Sonagi. She joined Navigator in May 2023 as a non-executive Director. She is currently Senior Adviser to the Semapa Group.

Maria Teresa Aliu Presas

Maria Teresa Aliu Presas holds a degree from the Instituto Superior de Psicologia Aplicada, Lisbon. She built her career in the paper industry, having joined the Tetra Pak Group in 1982, where she held various positions in Portugal, in Switzerland at the international headquarters, and in Brussels, in the areas of Marketing and Communications, Environment and European Affairs, including as Vice-President for the European Region and Head of Environment for the entire group. From 2003 to 2011, she led the Confederation of European Paper Industries (CEPI). She has been a director of various European associations, as well as a non-executive Director of Powerflute Oy. She served as a Director of the World Bioeconomy Forum from 2018 to 2025. She currently collaborates with the consultancy Magellan in Brussels, since 2015. She has been a non-executive Director of Navigator since 2019.

Mariana Rita Antunes Marques dos Santos

Mariana Marques dos Santos holds a degree in Business Management from Universidade Católica Portuguesa and complemented her academic training with an MBA from INSEAD (Fontainebleau), having also attended the same programme at Kellogg – Northwestern University, Chicago. From 1989 to 2006, she was a university lecturer, both in the area of quantitative methods at ISCTE and in strategy and internationalisation policy at the executive school IBS-ISCTE Business School. Alongside her management activities, she returned to academia in 2023, joining Henley Business School – Reading University, England, where she completed a postgraduate qualification in Psychology, Neuroscience and Executive Coaching in Organisational Change. In parallel with her academic activities, she developed a business career spanning various sectors and functions. Beginning with an introduction to the dynamics of financial markets, she collaborated with Lloyds Bank in the area of securities portfolio management. She subsequently joined a venture capital team - SFIR - where she served as a project analyst in 1991 and 1992. She also worked as a consultant in Madrid at the multinational firm Arthur D. Little, where she was involved in various projects, including the launch of its Portuguese branch, in 1995 and 1996. She then assumed a succession of international portfolios within the Abrantina Group between 1996 and 2007, notably in Mozambique and Germany, managing projects across various sectors, including food and the production and distribution of construction materials. At the end of 2007, she embarked on her own entrepreneurial venture, launching NBC Medical in the area of international pharmaceutical trade, where she was involved as Managing Partner until June 2021. She was a member of the Board of FAE - Fórum de Administradores e Gestores de Empresas between 2022 and 2025. She has been a non-executive Director of The Navigator Company since May 2019. Since January 2024, she has served as Vice-Chair of the International Trade Committee at World Trade Center Lisboa.

Sandra Maria Soares Santos

Sandra Santos holds a degree in Management from the Faculty of Economics of the University of Porto (1989–94) and completed an MBA at PBS - Porto Business School (1999). She began her career at Banco Espírito Santo and at the University of Porto in 1994, where she lectured as a Visiting Professor. At BES, she held various technical and commercial roles at a time when the bank was incorporating young managers and substantially transforming its organisational structure and business model. She began her career with the BA Group in late 1999 as a Controller, a function she developed as the group was embarking on its geographical expansion. Since then, she has held various positions, including Financial Director, Human Resources Director, Plant Director and CFO. It was in her capacity as CFO (2007) that she played an active role in the acquisition and integration processes of acquired companies. In 2012, she was seconded to serve as CFO of another business (plastic packaging) in which the BA shareholders had decided to invest, a mission that concluded one year later. Until February 2024, she served as CEO and member of the Board of Directors of the BA Group, a group with industrial operations in eight European countries and Mexico, sixteen industrial units, more than 5,000 employees and annual revenues of €1.6 billion. She was a member of the Board of Business Roundtable Portugal, established in 2021 with the ambition of contributing to Portugal's growth. She also served as a non-executive Director of BPI and Chair of its Talent Committee from 2023 to 2024. She is a non-executive Director of Titan Cement International, a member of the General Supervisory Board of EDP, and CEO of Logoplaste. She served as a non-executive Director of Navigator from April 2019 to March 2025.

Vítor Paulo Paranhos Pereira

Vítor Paranhos Pereira holds a degree in Economics from Universidade Católica Portuguesa and attended AESE (Universidad de Navarra). He began his professional career in 1982 at Empresa Gaspar Marques Campos Correia & C.ª, Lda., as Financial Director, until 1987. From 1987 to 1989, he served as Deputy to the Financial Directorate at the Portuguese Foreign Trade Institute (ICEP). In 1989, he joined the Group as Financial Director of Sodim, having been appointed as a member of its Board of Directors in 2009, a position he held until May 2018 and, thereafter, from March 2020 to the present. He also holds board positions in various companies related to Sodim, including, since 1998, Hotel Ritz. He also held board positions at Hotel Villa Magna between 2001 and 2016. He has been a Director of Sonagi since 1995, serving as Chairman of the Board of Directors since June 2020. He was appointed as a Director of Refundos in 2005, having served as Chairman of the Board of Directors of that company from 2018 until May 2020. From 2006 to 2015, he served as Chairman of the Supervisory Board of the Portuguese Hotel Association (AHP) and, in 2019, was appointed Chairman of its General Meeting Board. From 2007 to 2016, he served as Chairman of the General Meeting Board of the Portuguese Association of Investment Funds, Pensions and Assets (APFIPP). He served as a member of the

Supervisory Board of Eurovida - Companhia de Seguros, S.A. and Popular Seguros - Companhia de Seguros, S.A. from 2009 to 2018. In 2014, he was appointed as a member of the Board of Directors of Semapa, a position he held until May 2025. From March 2020 until May 2025, he served as an Executive Director of Semapa and of other companies related thereto, also holding board positions at Secil and The Navigator Company since 2020.

20. Regular and significant family, professional or business relationships of the members, as applicable, of the Board of Directors, General and Supervisory Board and Executive Committee with shareholders with qualified holdings exceeding 2% of voting rights.

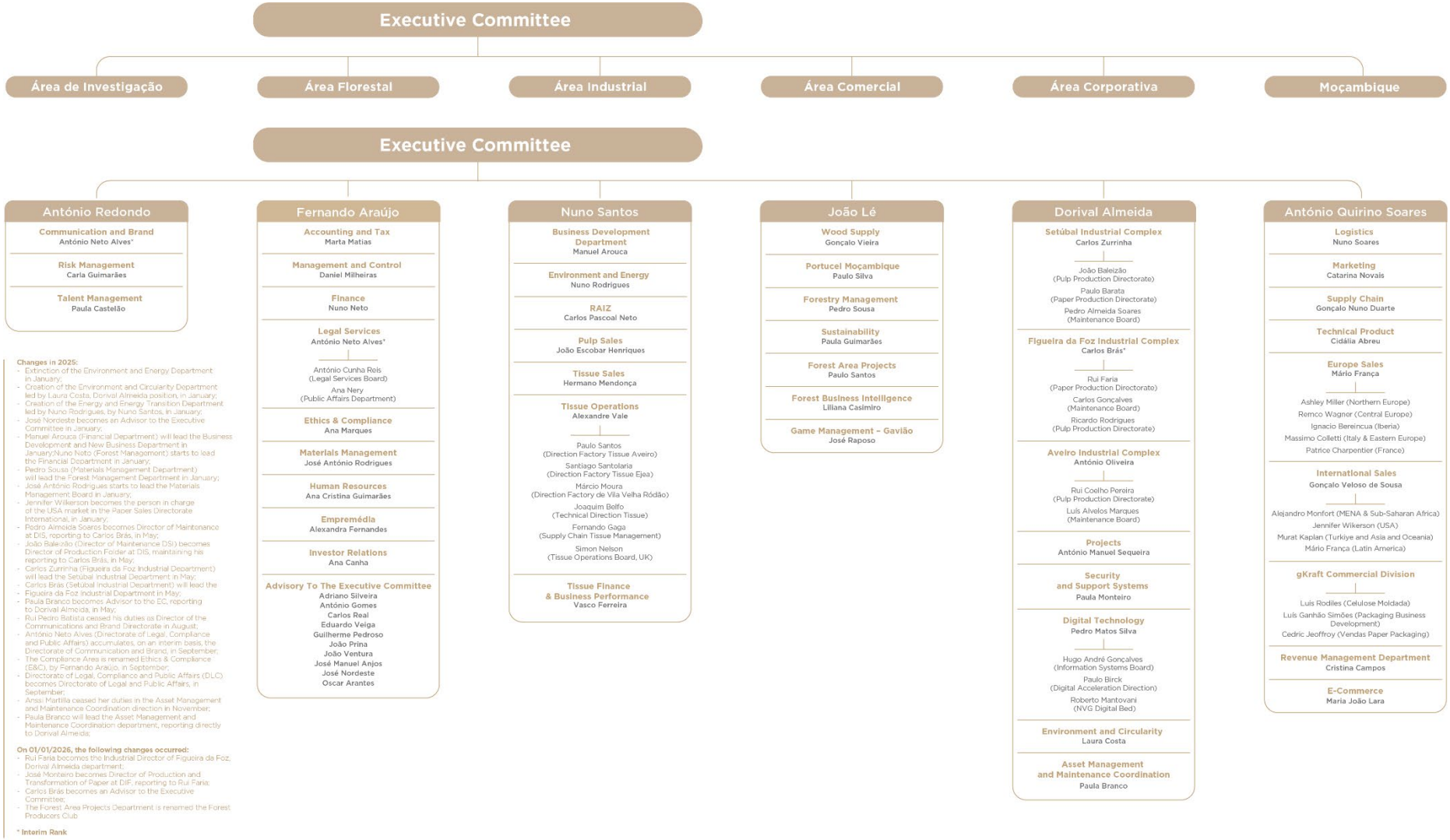
Amongst the members of the Company's Board of Directors throughout the reference year, Directors Ricardo Miguel dos Santos Pacheco Pires and Vítor Paulo Paranhos Pereira also served as Directors of the shareholder Semapa, whilst Hugo Alexandre Lopes Pinto and Maria Isabel da Silva Marques Abranches Viegas served as directors of Semapa.

Vítor Paranhos Pereira served as a Director of Semapa until 29 May 2025.

Maria Isabel da Silva Marques Abranches Viegas served as a director of Semapa until 30 May 2025, having commenced advisory duties thereafter.

21. Organisational or functional charts showing the division of powers between the different corporate boards, committees and/or company divisions, including information on delegated powers, in particular with regard to delegation of the daily management of the Company.

Between 1 January and 31 December 2025, the Executive Committee (which, in accordance with the Articles of Association, may comprise between three and nine members) was composed of six members, who divided amongst themselves the following responsibilities:



The powers delegated to the Executive Committee are as follows:

(a) To propose to the Board of Directors the Company's policies, objectives and strategies;

(b) To propose to the Board of Directors the operating budgets and medium and long-term investment and development plans, and to implement them following their approval;

(c) To approve budgetary amendments during the financial year, including transfers between cost centres within the Navigator Group, provided that, in any given year, these do not exceed twenty million euros (without prejudice to the provisions of § 1 below);

(d) To approve contracts for the acquisition of goods or services within the scope of the Navigator Group, the individual value of which does not exceed twenty million euros, without prejudice to the provisions of § 1 below;

(e) To approve financing contracts, requests for bank guarantees or the assumption of any other liabilities representing an increase in indebtedness of an aggregate value of less than twenty million euros in any given year, without prejudice to the provisions of § 1 below;

(f) To acquire, dispose of or encumber fixed assets of the companies of the Navigator Group up to an individual value of five per cent of the paid-up share capital;

(g) To take or grant leases of any immovable property;

(h) To represent the Company in and out of court, actively or passively, as well as to bring and pursue any actions, confess to and withdraw from them, and to settle, including in arbitral proceedings;

(i) To acquire, dispose of or encumber shareholdings in companies outside the Navigator Group up to a maximum of twenty million euros in any given year, without prejudice to the provisions of § 1 below;

(j) To resolve on the execution of the acquisition and disposal of own shares, where such has been resolved upon by the General Meeting and in compliance with the terms of such resolution;

(k) To manage shareholdings in other companies, including by appointing, with the agreement of the latter, the representatives on the respective Corporate Bodies and by defining guidelines for the conduct of such representatives;

(l) To enter into, amend and terminate employment contracts;

(m) To open, operate and close bank accounts;

(n) To appoint attorneys-in-fact of the Company;

(o) In general, all powers that are delegable by law, subject to any limitations arising from the provisions of the preceding paragraphs.

(§ 1.) The power to amend any terms of contracts previously entered into and falling within the scope of paragraphs (c), (d), (e) and (i) above shall vest in the body or bodies that would have had competence to enter into such contracts, having regard to the provisions of those paragraphs and the preceding paragraphs.

The Executive Committee may discuss all matters falling within the competence of the Board of Directors, without prejudice to its authority to resolve only on matters delegated to it.

The Regulations of the Executive Committee, approved by the Board of Directors, also establish the framework governing the conduct of Executive Directors.

Decisions relating to the definition of the Company's strategy, as well as its general policies and the corporate structure of the Navigator Group, fall within the competence of the Board of Directors, and no such powers have been delegated to the Executive Committee. non-executive Directors accordingly participate in the definition of strategy, principal policies, corporate structure and decisions that are to be considered strategic by virtue of their size or risk, as well as in the assessment of compliance therewith.

The management of the Company is centred on the interaction between the Board of Directors and the Executive Committee. Coordination and close engagement have been ensured by the close cooperation developed by the Chairman of the Board of Directors, Ricardo Pires, with the executive team, by the availability of the members of the Executive Committee to regularly transmit all relevant or urgent information, or information as requested, relating to the day-to-day management of the Company to the non-executive members of the Board of Directors, so as to enable ongoing monitoring of the Company's affairs, and by the convening of meetings of the Board of Directors for all strategic decisions or those considered to be of particular significance, even where these fall within the scope of the general delegated powers, and further by the attendance of the Chairman of the Board of Directors at certain meetings of the Company's Executive Committee.

With regard to the remaining members of the Corporate Bodies, information requested is provided by the members of the Executive Committee in a timely and appropriate manner.

To ensure the regular transmission of information, the notices of meeting and minutes of the Executive Committee are made available for consultation by the Supervisory Board. The remaining Committees and Corporate Bodies of the Company also ensure, in a timely and appropriate manner, and in accordance with their respective operating regulations and the requirements imposed by law and the Articles of Association, the inter-organ flow of information and documentation necessary for the exercise of the legal and statutory competences of each of the remaining Corporate Bodies and Committees.

With regard to strategic planning and investment policy, and without prejudice to the portfolio referred to in this regard, it is noted that this is, by its nature, an area of greater involvement by non-executive members and one in which the Chairman of the Board of Directors played a significant role. Non-executive Directors accordingly participate in the definition of strategy, principal policies, corporate structure and decisions that are to be considered strategic by virtue of their size or risk, as well as in the assessment of compliance therewith.

The Company has in place internal regulations governing the Board of Directors and the Supervisory Board, as well as the Internal Committees identified below, which set out rules on the functioning, competence and coordination of the various Corporate Bodies and Internal Committees.

Pursuant to the aforementioned regulations and other applicable rules, the Corporate Bodies and Internal Committees referred to above draw up complete minutes of their respective meetings.

The Corporate Bodies and Internal Committees identified above are required, under the terms of their respective internal operating regulations and as required by law and the Articles of Association, to make available to one another all information and documentation necessary for the exercise of the legal and statutory competences of each of the remaining Corporate Bodies and Committees. The various Directorates and Departments of the Company are also required to collaborate in the production, processing and dissemination of such information in an appropriate, rigorous and timely manner.

The regulations of the Board of Directors and of the Supervisory Body further establish, in particular, mechanisms that ensure, within the limits of applicable legislation and regulation, that their members have access to all information necessary for the assessment of the Company's performance, situation and development prospects, including, in particular, minutes, supporting documentation for resolutions adopted, notices of meeting and archives of the meetings of the other Corporate Bodies, without prejudice to access to any other documents or persons from whom clarifications may be requested.

It should be noted that the internal regulations of the Board of Directors and of the Supervisory Board were revised in 2024, following the revision of the IPCG Corporate Governance Code of 2018, which took place in 2023. The Regulations of the Supervisory Board were subsequently subject to a further revision in 2025, principally with the aim of clarifying that that Corporate Body carries out the analysis of both financial and non-financial information, a function which had, however, already been exercised previously.

With regard to sustainability, reference should be made to the competencies of the Sustainability Department which, in coordination with those of the various Departments of the Company and the Sustainability Forum, carries out its activities of steering, monitoring and reporting on specific matters, under the supervision of the Executive Committee and, where applicable, engaging all companies within the Group on a cross-cutting basis. As a result of this activity, the Company prepares annually its respective Annual Report which, from a consolidated perspective and in response to the legal requirements introduced by Decree-Law No. 89/2017 of 28 July, sets out a detailed analysis of the Company's approach to and commitment on sustainability matters.

With regard to sustainability information - which from 2006/2007 until 2024 was reported in accordance with the Global Reporting Initiative (GRI) Standards - it should be noted that, for the year ended 31 December 2025, such information was prepared in accordance with the requirements of the European Sustainability Reporting Standards (ESRS) and supplemented by additional indicators, determined in accordance with the GRI, in Chapter 9.2. Navigator has established processes to ensure the collection, processing and analysis of sustainability information. Accordingly, and through the observance and implementation of the aforementioned strategic principles, and as further detailed in the said Report, the Company ensures its long-term success, with a significant contribution to the community at large.

Navigator has a Responsible Management Agenda 2030, or Agenda 2030, anchored in the concept of "Creating Value with Responsibility" (Chapter 3.4), in alignment with the United Nations 2030 Agenda.

The Responsible Management Agenda 2030 was defined with the aim of increasing the Company's positive contribution over the long term - towards the 2030 horizon - and is organised around two strategic axes of action - Society and Climate and Nature - reflecting the two dimensions of its corporate purpose: People and the Planet (Chapter 2).

The Agenda 2030 is supported by a 2030 Roadmap, comprising a set of commitments (Chapter 3.4.4) that the Company undertakes to address the 11 material sustainability topics identified as a result of the review of the double materiality analysis conducted in 2024 (Chapter 5.1.4).

All of Navigator's material topics and their respective commitments have associated objectives, action plans and KPIs, supported, in the vast majority of cases, by a set of policies and codes (Chapter 3.4), amongst other structuring documents.

Throughout the sustainability report, the management approach followed by the Company, the actions undertaken during the reporting year and the performance achieved are described in detail, in alignment with the provisions of the 2030 Roadmap (Chapter 3.4).

The Agenda and the 2030 Roadmap aim to maximise the Company's performance on environmental, social and governance (ESG) matters, contributing to the resilience of the business and of the Company's corporate reputation and image, and creating the conditions for sustainability to become a strategic competitive advantage, whilst creating value for its various Stakeholders (Chapter 3.4).

Underpinning the various positive impacts generated by Navigator, which the Company seeks to enhance through its strategy and business model, are the sustainable management of forests and the development of forest-based products and solutions. Indeed, these contribute to a circular and low fossil-carbon bioeconomy, to the valorisation of the entire forest value chain, as well as to the development of the rural economy and to the promotion of employability and skills development within the sector. Also noteworthy is the fact that the Company is the single largest contributor to National Added Value, directly impacting the country's economy and wealth generation.

Navigator has a sustainability governance structure supported by various corporate bodies and committees with well-defined functions, also benefiting from the participation of external Stakeholders in some of those bodies, who support the Organisation in analysing its performance, identifying risks, formulating recommendations, amongst other matters (Chapter 5.1.4).

The Executive Committee delegates the management of the 2030 Roadmap to the heads of the Company's various directorates, with a team of sustainability key users responsible for monitoring the action plans set out therein and for providing information. These directorates and key users, with the guidance and support of the Sustainability Directorate, assess Navigator's performance against the objectives set. Proposals to amend the 2030 Roadmap arising from this process are submitted by the Sustainability Directorate to the Executive Committee for consideration and approval, and are subsequently made public in the Annual Report.

Risk assessment (Chapter 3.3) is likewise supported by its own governance structure and by duly defined processes, aligned with the IIA – Institute of Internal Auditors' Three Lines Model, as referred to in Section 51 of this report. It benefits from the involvement of the Sustainability Directorate and addresses risks related to environmental, social and governance (ESG) matters.

It should be noted that, throughout Chapters 3 and 5 of the Management Report, sustainability-related data may be consulted, with a compilation of the principal performance indicators also available in Chapter 8, supplemented by those in Chapter 9.2, with methodological notes recorded in context.

Navigator, as an industrial group producing pulp, paper, tissue and sustainable packaging solutions, manager of forest assets and producer of renewable electricity, places climate change at the centre of its concerns and accordingly presents a governance structure supported by various Corporate Bodies with well-defined functions with regard to sustainability management, including climate-related impacts (Chapter 5.2.2). It should be highlighted that, within the scope of the remuneration policy, monetary incentives have been established for members of the Executive Committee, promoting the management of climate-related matters. These incentives are contingent upon Navigator's environmental performance, with a view to achieving the defined targets and objectives.

Within the scope of the 2030 Roadmap (Chapter 3.4.4), a commitment is expressed to invest in low-carbon solutions towards carbon neutrality, supported by a set of objectives and targets aimed at reducing GHG emissions and increasing the share of renewable energy in total primary energy consumption. It should be noted that Navigator voluntarily adopted, since 2019, a roadmap towards carbon neutrality, reflecting the ambition to decarbonise its industrial complexes in Portugal by 2035 (EU Emissions Trading System (EU ETS) emissions). The commitment to reducing CO2 emissions was further extended through adherence to the Science Based Targets initiative (SBTi) and the approval, in 2022, of the submitted targets (Chapter 5.2.2).

The positive contribution to combating climate change and its effects is also expressed in other Roadmap commitments associated with the promotion of the circular forest-based bioeconomy, with an impact on the value chain — e.g. sustainable forest management and the development of bioproducts. Reference should likewise be made to the importance of promoting efficiency in the use of energy, water and materials, as well as the reduction and recovery of waste.

b) OPERATION

22. Existence of rules of procedure for the Board of Directors, the General and Supervisory Board and the Executive Committee, as the case may be, and place where these may be consulted.

The Operating Regulations of the Board of Directors of Navigator are published on the Company's website, in the Investors section relating to Corporate Governance, and are freely available for consultation at https://thenavigatorcompany.com/en/investors/governance/.

The Operating Regulations of the Board of Directors govern the exercise of its respective responsibilities, chairmanship, frequency of meetings, functioning and the framework of duties of its members.

In accordance with these Regulations, within the limits of applicable legislation:

(a) Members of the Board of Directors must be permanently ensured access to all information necessary for the assessment of the Company's performance, situation and development prospects, including, in particular, the minutes, supporting documentation for decisions taken, notices of meeting and archives of the meetings of the other Corporate Bodies, without prejudice to access to any other documents or persons from whom clarifications may be requested;

(b) The Board of Directors must make available to the other Corporate Bodies and Committees, in a timely and appropriate manner and as required by law and the Articles of Association, the inter-organ flow of information and documentation necessary for the exercise of the legal and statutory competences of each of the remaining Corporate Bodies and Committees;

(c) Non-executive Directors must participate in the definition, by the management body, of the strategy, principal policies, corporate structure and decisions that are to be considered strategic for the Company by virtue of their size, risk or special characteristics, as well as in the assessment of compliance therewith.

Directors who are members of the Executive Committee may not hold executive management positions in entities outside the corporate group of which the Company forms part, unless the activities of such entities are considered ancillary or complementary to the activities of the Group, or do not entail a material expenditure of time.

Directors who are not members of the Executive Committee may hold management positions (whether executive or non-executive) in entities outside the corporate group of which the Company forms part, provided that such entities do not carry on an activity in competition with that of the Company or of companies in which the Company holds direct or indirect shareholdings, and must inform the Chairman of the Board of Directors prior to assuming such positions.

The following matters may not be subject to general delegation:

(a) The definition of the strategy and principal policies of the Company, without prejudice to the Board of Directors' ability to delegate to the Executive Committee the preparation, for approval by the Board of Directors, of the proposed strategic plan and investment policy;

(b) The organisation and coordination of the corporate structure of the Company; and

(c) Matters that are, at any given time, considered strategic by virtue of their size, risk or special characteristics.

The Board of Directors must annually assess its own performance, as well as the performance of the Executive Committee and other Committees and of any delegated Directors, having regard to compliance with the Company's strategic plan and budget, risk management, its internal functioning and the contribution of each member thereto, and the functioning between the Corporate Bodies and Committees of the Company, identifying opportunities for improvement in such performance.

23. Number of meetings held and rate of meeting attendance of each member of the Board of Directors, General and Supervisory Board and Executive Committee, as applicable.

During the financial year 2025, the Board of Directors held ten meetings, detailed minutes of which were drawn up in accordance with the Regulations of the Board of Directors. At the ten meetings held, all members of the Board of Directors were present, corresponding to an attendance rate of 100%, save in respect of executive Director Eng. João Lé and non-executive Director Teresa Presas, who were each absent from one meeting for duly justified professional reasons, resulting in an attendance rate of 90% at meetings of the Board of Directors. In respect of non-executive Director Dr. Sandra Santos, who was absent from two of the three meetings held during her term of office for duly justified professional reasons, an attendance rate of 33% at meetings of the Board of Directors was recorded.

The number of meetings of the Board of Directors held is freely available for consultation on the Company's website at https://thenavigatorcompany.com/en/investors/governance/.

24. Indication of the company bodies empowered to assess the performance of executive directors.

The Remuneration Committee draws up the Remuneration Policy, defining the manner in which the system operates, and prepares the entire framework for the appraisal of executive Directors. The performance appraisal of each executive Director follows a structured internal process led by the relevant responsible person (i.e. under the responsibility of the person who chairs the team, in the case of members of the Executive Committee, and under the responsibility of the Chairman of the Board of Directors, in the case of the Chairman of the Executive Committee), in which such non-executive Directors as the responsible person deems appropriate to involve also participate.

This process also involves the Talent Committee, currently composed of three non-executive members of the Board of Directors, whose remit includes monitoring the performance appraisal system for executive management and the Company's remuneration award process, and providing an opinion on the individual performance appraisal proposals for executive management, which renders unnecessary any additional involvement of the Board of Directors itself in the appraisal of executive Directors' performance.

Finally, it is the responsibility of the Remuneration Committee to confirm, with regard to performance appraisal, the respective achievement factors and to ensure the overall coherence of the process, by setting variable remuneration.

Accordingly, in 2025 and in respect of the financial year 2024, the Talent Committee met and provided its opinion on the individual performance proposals of the members of the Executive Committee, Dr. José Fernando Morais Carreira de Araújo, Eng. Nuno Miguel Moreira de Araújo Santos, Eng. João Paulo Cabete Gonçalves Lé, Eng. Dorival Martins de Almeida and Dr. António Quirino Vaz Duarte Soares, issued by the CEO, and of the CEO, Eng. António José Pereira Redondo, issued by the Chairman of the Board of Directors, communicating its opinion to the Remuneration Committee. These performance appraisal proposals were based on the application of the base criteria for the appraisal of executive Directors' performance in force at Navigator, as more fully described in point 25.

In turn, and pursuant to the provisions of the Regulations of the Board of Directors and the Regulations of the Remuneration Committee, the Board of Directors, monitored by the Remuneration Committee, must annually assess its own performance, as well as the performance of its Committees, including the Executive Committee, having regard to compliance with the Company's strategic plan and budget, risk management, its internal functioning and the contribution of each member thereto, and the relationship between the Corporate Bodies and Committees of the Company. Pursuant to the provisions of its respective regulations, the Talent Committee monitors the overall performance appraisal of the Board of Directors.

The appraisal of executive Directors, as well as the self-assessment of the Board of Directors and its Committees, took place during the financial year 2025 in respect of the 2024 performance, and will take place in 2026 in respect of the financial year 2025, in the terms described above.

25. Predetermined criteria for assessing the performance of executive directors.

The base criteria for the appraisal of executive Directors' performance that were in force in 2023–2025 were those described in point 2.2 of Chapter 2 of the Remuneration Policy for the determination of the variable component of remuneration. These criteria are implemented through a system of quantitative and qualitative KPIs, related to the performance of the Company and of the Director concerned. Amongst the general business indicators, particular relevance is given to EBITDA (weighted at 35%), net results (weighted at 10%), cash flow (weighted at 10%) and Total Shareholder Return vs. Peers (weighted at 10%), and in respect of behavioural competencies, the alignment of each Director with the long-term and sustainability interests of the Company is of particular relevance.

In addition to these criteria, and in alignment with the commitments undertaken by the Company in its sustainability strategy, the importance of efficient energy use and the need to reduce CO2 emissions of fossil origin from economic activities are recognised, with the continued implementation of actions focused on improving energy performance being maintained. Accordingly, the specific objectives will always include ESG indicators, such as, for example, the results of the Company's annual climate survey, the reduction of CO2 emissions, certified timber, and water, energy and timber consumption.

26. Availability of each of the members of the Board of Directors, the General and Supervisory Board and the Executive Committee, as the case may be, indicating office held simultaneously in other companies, inside and outside the Group, and other relevant activities carried out by the members of these bodies during the period.

Ricardo Miguel dos Santos Pacheco Pires

Positions held in Navigator Group companies

The Navigator Company, S.A.	Chairman of the Board of Directors

Positions held in other companies / entities

Aphelion, S.A.	Chairman of the Board of Directors
Ananke Nexus, S.A.	Chairman of the Board of Directors[69]
ETSA - Investimentos, SGPS, S.A.	Chairman of the Board of Directors[70]
Quotidian Podium, S.A.	Chairman of the Board of Directors
Secil - Companhia Geral de Cal e Cimento, S.A.	Chairman of the Board of Directors
Semapa Inversiones, S.L.	Director[71]
Semapa Next, S.A.	Chairman of the Board of Directors
Triangle's - Cycling Equipments, S.A.	Chairman of the Board of Directors
Triangle's 2 - Cycling Produts, Unipessoal Lda.	Director
Cimo - Gestão de Participações, SGPS, S.A.	Director
Fundação Semapa – Pedro Queiroz Pereira	Director
Pyrus Agricultural LLC	Director
Pyrus Investments LLC	Director
Pyrus Real Estate LLC	Director
Sodim, SGPS, S.A.	Director
Upsis, S.A.	Director
Upsis - Consultoria e Investimentos, S.A.	Chairman of the Board of Directors

António José Pereira Redondo

Positions held in Navigator Group companies

Accrol Holdings Limited	Director [72]
Art Tissue	Director [73]
Bosques do Atlántico, S.L.	Chairman of the Board of Directors
Enerpulp - Cogeração Energética de Pasta, S.A.	Chairman of the Board of Directors
John Dale (Holdings) Limited	Director
John Dale Limited	Director
Leicester Tissue Company Limited	Director
LTC Parent Ltd.	Director
Navigator Brands, S.A.	Chairman of the Board of Directors
Navigator Corporate UK Limited	Director
Navigator Forest Portugal, S.A.	Chairman of the Board of Directors
Navigator Green Fuels Figueira da Foz, S.A.	Chairman of the Board of Directors

[69] Since 17 December 2025

[70] Until 19 November 2025

[71] Since February 2026; until then was a Director

[72] Until 27 May 2025

[73] Until 17 June 2025

Navigator Green Fuels Setúbal, S.A.	Chairman of the Board of Directors
Navigator Holding Tissue UK Limited	Director
Navigator North America, Inc.	Chairman of the Board of Directors
Navigator Paper Figueira, S.A.	Chairman of the Board of Directors
Navigator Paper México S. de R.L. de C.V.	Director
Navigator Paper Setúbal, S.A.	Chairman of the Board of Directors
Navigator Parques Industriais, S.A.	Chairman of the Board of Directors
Navigator Pulp Aveiro, S.A.	Chairman of the Board of Directors
Navigator Pulp Figueira, S.A.	Chairman of the Board of Directors
Navigator Pulp Setúbal, S.A.	Chairman of the Board of Directors
Navigator Tissue Aveiro, S.A.	Chairman of the Board of Directors
Navigator Tissue Ejea, S.L.	Chairman of the Board of Directors
Navigator Tissue Ibérica, S.A.	Chairman of the Board of Directors[74]
Navigator Tissue Ródão, S.A.	Chairman of the Board of Directors
Navigator Tissue UK Limited	Director
RAIZ - Instituto de Investigação da Floresta e Papel	Chairman of the Board of Directors
Severn Delta Limited	Director
The Navigator Company, S.A.	CEO and Director

Positions held in other companies / entities

Biond – Forest Fibers from Portugal	Chairman
CIP (Confederation of Portuguese Business)	Director
CEPI (Confederation of European Paper Industries)	Board Member
Euro-Graph (European Association of Graphic Paper Producers)	Board Member
AmCham Portugal (American Chamber of Commerce in Portugal)	Board Member
Engineering Academy	Member
FCT, University of Coimbra, Department of Chemical Engineering	Visiting Professor
FCT, Universidade Nova de Lisboa, Department of Materials Science	Visiting Professor

José Fernando Morais Carreira de Araújo

Positions held in Navigator Group companies

Accrol Holdings Limited	Director[75]
Art Tissue Ltd.	Director[76]
Bosques do Atlántico, S.L.	Director
Empremedia Re Designated Activity Company	Director
Empremédia - Corretores de Seguros, S.A.	Chairman of the Board of Directors
Enerpulp - Cogeração Energética de Pasta, S.A.	Director
John Dale (Holdings) Limited	Director
John Dale Limited	Director
Leicester Tissue Company Limited	Director
LTC Parent Ltd.	Director
Navigator Africa, S.R.L.	Director
Navigator Afrique du Nord, SARLAU	Director
Navigator Brands, S.A.	Director
Navigator Corporate UK Limited	Director
Navigator Deutschland GMBH	Director
Navigator Egypt (LLC)	Director
Navigator Eurasia Kağıt ve Kağıt Ürünleri Sanayi ve Ticaret Anonim Şirketi	Vice-Chairman of the Board of Directors
Navigator Forest Portugal, S.A.	Director
Navigator France SAS	General-Director
Navigator Green Fuels Figueira da Foz, S.A.	Director
Navigator Green Fuels Setúbal, S.A.	Director
Navigator Holding Tissue UK Limited	Director

[74] Until 28 November 2025

[75] Until 27 May 2025

[76] Until 17 June 2025

Navigator Itália, S.R.L.	Director
Navigator Middle East Trading DMCC	Director
Navigator Netherlands B.V.	Director
Navigator North America, Inc.	Director
Navigator Paper Austria GMBH	Director
Navigator Paper España S.A.	Director
Navigator Paper Figueira, S.A.	Director
Navigator Paper México S. de R.L. de C.V.	Director
Navigator Paper Setúbal, S.A.	Director
Navigator Paper Southern Africa Proprietary Limited	Director
Navigator Paper UK Ltd.	Director
Navigator Parques Industriais, S.A.	Director
Navigator Poland Paper Sp. z o.o.	Director
Navigator Pulp Aveiro, S.A.	Director
Navigator Pulp Figueira, S.A.	Director
Navigator Pulp Setúbal, S.A.	Director
Navigator Tissue Aveiro, S.A.	Director
Navigator Tissue Ejea, S.L.	Director
Navigator Tissue France SAS	General-Director
Navigator Tissue Ibérica, S.A.	Director [77]
Navigator Tissue Ródão, S.A.	Director
Navigator Tissue UK Limited	Director
Portucel Moçambique - Sociedade de Desenvolvimento Florestal e Industrial, S.A.	Director
Portucel Nigeria Limited	Director
Pulpchem Logistics, ACE	Director
RAIZ - Instituto de Investigação da Floresta e Papel	Director
Severn Delta Limited	Director
The Navigator Company, S.A.	Executive Director

Positions held in other companies / entities

Biond - Forest Fibers from Portugal	Vice Chair of the General Meeting
AFP - Portuguese Tax Association	Member of the Executive Board
Order of Certified Public Accountants	Member of the Supervisory Board

Nuno Miguel Moreira de Araújo Santos

Positions held in Navigator Group companies

Accrol Holdings Limited	Director[78]
Art Tissue Ltd.	Director[79]
Bosques do Atlántico, S.L.	Director
Enerpulp - Cogeração Energética de Pasta, S.A.	Director
John Dale (Holdings) Limited	Director
John Dale Limited	Director
Leicester Tissue Company Limited	Director
LTC Parent Ltd.	Director
Navigator Africa, S.R.L.	Director
Navigator Brands, S.A.	Director
Navigator Corporate UK Limited	Director
Navigator Forest Portugal, S.A.	Director
Navigator Green Fuels Figueira da Foz, S.A.	Director
Navigator Green Fuels Setúbal, S.A.	Director
Navigator Holding Tissue UK Limited	Director
Navigator North America, INC.	Director
Navigator Paper Figueira, S.A.	Director

[77] Until 28 November 2025

[78] Until 27 May 2025

[79] Until 17 June 2025

Navigator Paper Setúbal, S.A.	Director
Navigator Parques Industriais, S.A.	Director
Navigator Pulp Aveiro, S.A.	Director
Navigator Pulp Figueira, S.A.	Director
Navigator Pulp Setúbal, S.A.	Director
Navigator Tissue Aveiro, S.A.	Director
Navigator Tissue Ejea, S.L.	Director
Navigator Tissue France SAS	Chairman of the Board of Directors
Navigator Tissue Iberica, S.A.	Director [80]
Navigator Tissue Ródão, S.A.	Director
Navigator Tissue UK Limited	Director
RAIZ - Instituto de Investigação da Floresta e Papel	Director
Severn Delta Limited	Director
The Navigator Company, S.A.	Executive Director

Positions held in other companies / entities

APIGCEE (Portuguese Association of Large Industrial Electricity Consumers)	President

João Paulo Cabete Gonçalves Lé

Positions held in Navigator Group companies

Accrol Holdings Limited	Director [81]
Art Tissue Ltd.	Director [82]
Bosques do Atlántico, S.L.	Director
Enerpulp - Cogeração Energética de Pasta, S.A.	Director
Greenbloom A.C.E.	Chairman of the Board of Directors[83]
John Dale (Holdings) Limited	Director
John Dale Limited	Director
Leicester Tissue Company Limited	Director
LTC Parent Ltd.	Director
Navigator Abastecimento de Madeira, ACE	Director
Navigator Africa, S.R.L.	Chairman of the Board of Directors
Navigator Brands, S.A.	Director
Navigator Corporate UK Limited	Director
Navigator Forest Portugal, S.A.	Director
Navigator Green Fuels Figueira da Foz, S.A.	Director
Navigator Green Fuels Setúbal, S.A.	Director
Navigator Holding Tissue UK Limited	Director
Navigator North America, INC.	Director
Navigator Paper Figueira, S.A.	Director
Navigator Paper Setúbal, S.A.	Director
Navigator Parques Industriais, S.A.	Director
Navigator Pulp Aveiro, S.A.	Director
Navigator Pulp Figueira, S.A.	Director
Navigator Pulp Setúbal, S.A.	Director
Navigator Tissue Aveiro, S.A.	Director
Navigator Tissue Ejea, S.L.	Director
Navigator Tissue Ibérica, S.A.	Director [84]
Navigator Tissue Ródão, S.A.	Director
Navigator Tissue UK Limited	Director
Portucel Moçambique - Sociedade de Desenvolvimento Florestal e Industrial, S.A.	Chairman of the Board of Directors

[80] Until 28 November 2025

[81] Until 27 May 2025

[82] Until 17 June 2025

[83] Until 2 May 2025

[84] Until 28 November 2025

RAIZ - Instituto de Investigação da Floresta e Papel	Director
Severn Delta Limited	Director
The Navigator Company, S.A.	Executive Director
Viveiros Aliança - Empresa Produtora de Plantas, S.A.	Chairman of the Board of Directors

Positions held in other companies / entities
In 2025, he did not hold any positions in other companies or entities.

Dorival Martins de Almeida

Positions held in Navigator Group companies

Accrol Holdings Limited	Director [85]
ART Tissue Ltd.	Director [86]
Bosques do Atlántico, S.L.	Director
EMA Cacia - Engenharia e Manutenção Industrial, ACE	Director
EMA Figueira da Foz - Engenharia e Manutenção Industrial, ACE	Director
Ema Setúbal - Engenharia e Manutenção Industrial, ACE	Director
Enerpulp - Cogeração Energética de Pasta, S.A.	Director
John Dale (Holdings) Limited	Director
John Dale Limited	Director
Leicester Tissue Company Limited	Director
LTC Parent Ltd.	Director
Navigator Brands, S.A.	Director
Navigator Corporate UK Limited	Director
Navigator Forest Portugal, S.A.	Director
Navigator Green Fuels Figueira da Foz, S.A.	Director
Navigator Green Fuels Setúbal, S.A.	Director
Navigator Holding Tissue UK Limited	Director
Navigator North America, Inc.	Director
Navigator Paper Figueira, S.A.	Director
Navigator Paper Setúbal, S.A.	Director
Navigator Parques Industriais, S.A.	Director
Navigator Pulp Aveiro, S.A.	Director
Navigator Pulp Figueira, S.A.	Director
Navigator Pulp Setúbal, S.A.	Director
Navigator Tissue Aveiro, S.A.	Director
Navigator Tissue Ejea, S.L.	Director
Navigator Tissue Ibérica, S.A.	Director [87]
Navigator Tissue Ródão, S.A.	Director
Navigator Tissue UK Limited	Director
RAIZ - Instituto de Investigação da Floresta e Papel	Director
Severn Delta Limited	Director
The Navigator Company, S.A.	Executive Director

Positions held in other companies / entities
In 2025, he did not hold any positions in other companies or entities.

[85] Until 27 May 2025

[86] Until 17 June 2025

[87] Until 28 November 2025

António Quirino Vaz Duarte Soares

Positions held in Navigator Group companies

Accrol Holdings Limited	Director [88]
Art Tissue Ltd	Director [89]
Bosques do Atlántico, S.L.	Director
Enerpulp - Cogeração Energética de Pasta, S.A.	Director
John Dale (Holdings) Limited	Director
John Dale Limited	Director
Leicester Tissue Company Limited	Director
LTC Parent Ltd.	Director
Navigator Brands, S.A.	Director
Navigator Corporate UK Limited	Director
Navigator Deutschland GMBH	Director
Navigator Egypt (LLC)	General-Director
Navigator Eurasia Kağıt ve Kağıt Ürünleri Sanayi ve Ticaret Anonim Şirketi	Chairman of the Board of Directors
Navigator Fiber Solutions, S.A.	Chairman of the Board of Directors
Navigator Forest Portugal, S.A.	Director
Navigator France SAS	Chairman of the Board of Directors
Navigator Green Fuels Figueira da Foz, S.A.	Director
Navigator Green Fuels Setúbal, S.A.	Director
Navigator Holding Tissue UK Limited	Director
Navigator Itália, S.R.L.	Chairman of the Board of Directors
Navigator Netherlands B.V.	Chairman of the Board of Directors
Navigator North America, Inc.	Director
Navigator Paper Austria GMBH	Director
Navigator Paper España S.A.	Chairman of the Board of Directors
Navigator Paper Figueira, S.A.	Director
Navigator Paper Setúbal, S.A.	Director
Navigator Paper Southern Africa Proprietary Limited	Director
Navigator Paper UK Ltd.	Director
Navigator Parques Industriais, S.A.	Director
Navigator Poland Paper Spółka z Ograniczoną Odpowiedzialnością	Chairman of the Board of Directors
Navigator Pulp Aveiro, S.A.	Director
Navigator Pulp Figueira, S.A.	Director
Navigator Pulp Setúbal, S.A.	Director
Navigator Tissue Aveiro, S.A.	Director
Navigator Tissue Ejea, S.L.	Director
Navigator Tissue Ibérica, S.A.	Director[90]
Navigator Tissue Ródão, S.A.	Director
Navigator Tissue UK Limited	Director
Portucel Nigeria Limited	Director
RAIZ - Instituto de Investigação da Floresta e Papel	Director
Severn Delta Limited	Director
The Navigator Company, S.A.	Executive Director

Positions held in other companies / entities

In 2025, he did not hold any positions in other companies or entities.

[88] Until 27 May 2025

[89] Until 17 June 2025

[90] Until 28 November 2025

Ana Teresa Cunha de Pinho Tavares Lehmann

Positions held in Navigator Group companies

The Navigator Company, S.A.	Director

Positions held in other companies / entities

TAP - Transportes Aéreos Portugueses, S.A.	Director
BCR - Brisa Concessão Rodoviária, S.A.	Director
Futebol Clube do Porto - Futebol, SAD	Director
TAP Transportes Aéreos Portugueses, S.A.	Chairman of the Finance, Audit and Risk Committee
Zolve - Logística e Transporte, S.A.	Chairman of the Board of Directors
Orkestra - Basque Competitiveness Institute	Member of the Advisory Board
University of Fribourg Competitiveness Institute	Member of the Advisory Board
Vibe Capital Partners	Member of the Advisory Board
CIP Digital Economy Strategic Council (CEEDIT)	Member
AEP – Portuguese Business Association Advisory Board	Member

Hugo Alexandre Lopes Pinto

Positions held in Navigator Group companies

The Navigator Company, S.A.	Director

Positions held in other companies / entities

Aphelion, S.A.	Director [91]
Ananke Nexus, S.A	Director [92]
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Member of the Executive Officers Committee
	Member of the Risk Committee[93]
Capital Hotels – Sociedade de Investimentos e Gestão, S.A.	Director
ETSA - Investimentos, SGPS, S.A.	Chairman of the Board of Directors[94]
Fundação Semapa - Pedro Queiroz Pereira	Member of the Advisory Board
Fundação Nossa Senhora do Bom Sucesso	Member of the Supervisory Board[95]
Hotel Ritz, S.A.	Director
Quotidian Podium, S.A.	Director
Secil - Companhia Geral de Cal e Cimentos, S.A.	Director
Semapa Next, S.A.	Director
Sonagi, SGPS, S.A.	Member of the Remuneration Committee

Maria Isabel da Silva Marques Abranches Viegas

Positions held in Navigator Group companies

The Navigator Company, S.A.	Director

Positions held in other companies / entities

Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Chief People Officer[96]
	(Member of the Executive Officers Committee) [97]
	Member of the Talent Committee[98]
Secil – Companhia Geral de Cal e Cimentos, S.A.	Director [99]

[91] Since 30 July 2025

[92] Since 17 December 2025

[93] Since 30 May 2025

[94] Since 19 November 2025, until then was a member

[95] Until 3 Dezember 2025

[96] Until 29 May 2025

[97] Until 29 May 2025.

[98] Until 29 May 2025.

[99] Until 28 July 2025.

	Member of the Remuneration Committee[100]
Semapa Next	Director [101]
	Member of the Remuneration Committee[102]
ETSA – Investimentos, SGPS, SA	Member of the Remuneration Committee[103]
Quotidian Podium, S.A.	Director[104]
Sonagi, SGPS, S.A.	Member of the Remuneration Committee[105]

Maria Teresa Aliu Presas

Positions held in Navigator Group companies

The Navigator Company, S.A.	Director

Positions held in other companies / entities

World Bioeconomy Forum	Director
Magellan Association	Senior Consultant

Mariana Rita Antunes Marques dos Santos

Positions held in Navigator Group companies

The Navigator Company, S.A.	Director

Positions held in other companies / entities

International Trade Committee – Business Club, World Trade Center Lisboa	Co-President
FAE – Forum for Business Administrators and Managers	Director[106]

Vítor Paulo Paranhos Pereira

Positions held in Navigator Group companies

The Navigator Company, S.A.	Director

Positions held in other companies / entities

Aphelion, S.A.	Director [107]
Antasobral – Sociedade Agropecuária, S.A.	Director
Capital Hotels – Sociedade de Investimentos e Gestão, S.A.	Director
Cimo – Gestão de Participações, SGPS, S.A.	Director
Fundação Semapa – Pedro Queiroz Pereira	Member of the Advisory Board
Galerias Ritz, S.A.	Chairman of the Board of Directors
Hotel Ritz, S.A.	Director
Parque Ritz, S.A.	Chairman of the Board of Directors
Quotidian Podium, S.A.	Director [108]
Secil – Companhia Geral de Cal e Cimento, S.A.	Director [109]
Semapa Inversiones, S.L	Chairman of the Board of Directors
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Director [110]

[100] Until 28 July 2025.

[101] Until 21 July 2025.

[102] Until 17 July 2025.

[103] Until 17 July 2025.

[104] Until 30 July 2025.

[105] Until 21 July 2025.

[106] Termination of office at the elective General Meeting held on April 10, 2025.

[107] Until 30 July 2025

[108] Until 30 July 2025

[109] Until 28 July 2025

[110] Until 29 May 2025

Semapa Next, S.A.	Executive Director[111]
Sociedade Agrícola Herdade dos Fidalgos, Unip., Lda	Director [112]
Sodim, SGPS, S.A.	Director
Sonagi, SGPS, S.A.	Director
Sonagi – Imobiliária, S.A.	Chairman of the Board of Directors
Associação da Hotelaria de Portugal	Chairman of the Board of Directors
	Chairman of the General Meeting

c) Committees belonging to the management or supervisory bodies and managing directors

27. Identification of committees set up by the Board of Directors, the General and Supervisory Board and the Executive Committee, as the case may be, and place where the rules of procedure may be consulted.

The Board of Directors includes the following committees:

i. Executive Committee

ii. Corporate Governance Committee

iii. Talent Committee

iv. Environmental Council

v. Sustainability Forum

vi. Risk Management Committee

The Operating Regulations of the Internal Committees provide for the exercise of their respective powers, chairmanship, frequency of meetings, operation and the duties of their members. Detailed minutes of the respective meetings are drawn up and can be consulted on the Company's website at https://en.thenavigatorcompany.com/Investors/Governance.

The composition and number of annual meetings of the Internal Committees are publicised on the Company's website at https://en.thenavigatorcompany.com/Investors/Governance.

In accordance with their respective Operating Regulations, the Internal Committees must ensure, in a timely and appropriate manner, the flow of information, starting with the respective convening notices and minutes, necessary for the exercise of the legal and statutory competences of each of the other bodies and committees.

28. Composition, if applicable, of the Executive Committee and/or identification of the Managing Director(s).

On 31 December 2024, the Executive Committee comprised the following directors:

Chairman:

- António José Pereira Redondo

[111] Until 29 May 2025

[112] Until 21 July 2025

Members:

- José Fernando Morais Carreira de Araújo
- Nuno Miguel Moreira de Araújo Santos
- João Paulo Cabete Gonçalves Lé
- Dorival Martins de Almeida
- António Quirino Vaz Duarte Soares

29. Indication of the powers of each of the committees created and summary of the activities carried on the exercise of these responsibilities.

EXECUTIVE COMMITTEE

The powers of the Executive Committee are listed in point 21 of this report.

The Executive Committee is the Company's executive management body and has developed its competences within the scope of the delegation of powers entrusted to it by the Board of Directors. This Committee meets regularly and whenever necessary, depending on the business in progress and monitoring the Company's activity, and met 48 times during the 2024 financial year.

In addition to the members of the Executive Committee, whenever matters so warrant, these meetings are attended by non-executive directors, directors of Group companies and members of Navigator's various divisions.

CORPORATE GOVERNANCE COMMITTEE

The Corporate Governance Committee is composed of four members, namely Ricardo Miguel dos Santos Pacheco Pires (Chairman), António José Pereira Redondo, António Pedro Gomes Paula Neto Alves and Rui Tiago Trindade Ramos Gouveia.

In addition to the permanent supervision of the Company's compliance with the applicable legal, regulatory and statutory provisions on corporate governance, the Corporate Governance Committee is responsible for the critical analysis of the Company's practices and conduct in the area of corporate governance and for taking the initiative in proposing the discussion, amendment and introduction of new procedures aimed at improving the corporate structure and governance. The Corporate Governance Committee must also annually assess the state of the Company's governance and submit to the Board of Directors such proposals as it considers appropriate.

In 2025, in addition to the routine work and communications carried out by electronic means, the Committee held three meetings, at which the following matters were analysed:

- Analysis of and comments on the Corporate Governance Report relating to 2024;
- Analysis of the assessment of compliance with the IPCG Corporate Governance Code conducted by the Executive Monitoring and Follow-up Committee (CEAM), by reference to the 2024 period;
- Comparative analysis of compliance with the IPCG CGS Recommendations by other listed companies;
- Self-assessment and composition of the Board of Directors;
- Composition of the Ethics and Integrity Committee;
- Initiatives to be carried out in 2026.

TALENT COMMITTEE

The Talent Committee is made up of three to seven members, including a majority of non-executive directors, one of whom will be chairman, appointed by the Board of Directors for a period of three years, coinciding with the term of office of the Board of Directors. In 2025, the Committee had five members: Ricardo Miguel dos Santos Pacheco Pires (Chairman), António José Pereira Redondo, Hugo Alexandre Lopes Pinto, Maria Isabel da Silva Marques Abranches Viegas and Mariana Rita Antunes Marques dos Santos.

Pursuant to its Internal Regulations, the Talent Committee is responsible for monitoring and supporting the appointment of senior management of the Company and the Navigator Group, as well as for assessing the performance of such senior management.

In the performance of its duties, and without prejudice to any other competences assigned to it by the Company's Board of Directors, the Talent Committee is specifically responsible, with regard to the Corporate Bodies, for the following:

In terms of appointments:

- Assisting the Board of Directors in identifying and assessing the suitability of the profile, knowledge and curriculum vitae of members of the governing bodies to be appointed, namely the appointment by co-option to fulfil the duties of a member of the Company's Board of Directors, as well as the choice of directors to fulfil executive duties;
- Making its terms of reference available and, to the best of its ability, introduce transparent selection processes that include effective mechanisms for identifying potential candidates, and that those who are most meritorious, best suited to the requirements of the position and promote appropriate diversity within the organisation, including gender diversity, are chosen for proposals;
- Whenever deemed appropriate, to be aware of and monitor the selection processes for potential candidates to fulfil executive management functions in subsidiary companies of the Group, in cases where the Company intends to submit the respective elective proposal.

In terms of assessments:

- To monitor the system for assessing management performance and awarding Company remuneration;
- To give its opinion on the proposals for the annual individual performance appraisal of the members of the Executive Committee, issued by the respective Chairman, and of the latter, issued by the Chairman of the Board of Directors;
- To monitor the overall assessment of the performance of the Board of Directors as a body, taking into account the fulfilment of the Company's strategic plan and budget, risk management, its internal functioning and the contribution of each member to this end.

In addition to other duties expressly assigned to it by the Board of Directors, it is the responsibility of the Appointments and Appraisals Committee, particularly with regard to the other managerial staff:

- To monitor and issue recommendations on the Group's internal talent management policies and procedures;
- Periodically assessing the need for and availability of talent at Group level and recommending the appropriate actions to ensure the Group's ability to respond to the challenges that arise, namely monitoring and issuing recommendations on internal policies and procedures relating to selection, hiring, remuneration, ongoing assessment, remuneration and incentive policies, as well as the succession plan for senior management, and making any recommendations it deems appropriate in this regard.

The Committee is also responsible for talent management, especially with regard to senior management: (i) monitoring and issuing recommendations on the Group's internal talent management policies and procedures and (ii) periodically assessing the need for and availability of talent at Group level and recommending the appropriate actions to ensure the Group's ability to respond to the challenges that arise.

By virtue of its members and its competences in terms of remuneration, performance assessment and appointments, the existence of this Committee reflects adherence to Recommendation II.2.5. of the IPCG Corporate Governance Code.

Having regard to its competences, in 2025, in addition to the routine work and communications carried out by electronic means, which occur on a permanent basis, the Talent Committee held one meeting at which the following matters were discussed: (a) performance appraisals of the members of the Executive Committee in respect of the financial year 2024; and (b) variable remuneration of the members of the Executive Committee.

ENVIRONMENTAL COMMITTEE

Given the specific nature of the Navigator Group's activities and the environmental concerns inherent thereto, the Board of Directors established an Environmental Committee, whose remit is to monitor and provide opinions on the environmental aspects of the Company's activities and to formulate recommendations on the environmental impact of its principal projects, having particular regard to the applicable legal provisions, licensing conditions and the Navigator Group's policy on the matter.

The Environmental Committee comprises four members: Maria da Conceição Cunha (Chairman), Ana Isabel Miranda, Maria Margarida Tomé and Joaquim Poças Martins, all of whom are independent academic figures of recognised technical and scientific competence, particularly in the most significant areas of environmental concern arising from the Navigator Group's activities in its current configuration.

The Environmental Committee maintains direct contact with the Navigator Group's business universe through meetings held at its industrial facilities, its principal forest plantations and its research institute, RAIZ.

In 2025, two meetings of the Environmental Committee were held, at which the following matters were addressed: environmental performance; principal ongoing projects; changes in sustainability and environmental regulation in the EU; plans for reducing water usage at NVG's mills; NVG's decarbonisation roadmap; valorisation of industrial waste in forestry; and biodiversity conservation.

SUSTAINABILITY FORUM

Recognising the fundamental role that sustainability plays in the strategic development of the Navigator Group, the Navigator Sustainability Forum was established in 2015.

The primary objective of the Forum is to foster collaboration between the Navigator Group and individuals forming part of its sphere of activity, ranging from non-governmental organisations and universities to social organisations, Customers and Suppliers.

This initiative seeks to strengthen dialogue with its principal Stakeholders, promoting debate and active listening on matters relevant to the Company and to Society.

As a general rule, the Sustainability Forum meets twice a year, with one session involving Permanent Members only, and another extending participation to various Stakeholders, with a central topic under discussion. The Sustainability Forum sessions are aimed at deepening understanding of matters that are essential to sustainability as a pillar of business strategy, and at gathering contributions for the formulation of corporate policy on matters of social and environmental responsibility, positioning themselves as platforms for understanding and cooperation between the Navigator Group and its principal Stakeholders.

The Sustainability Forum is composed of internal and external members, and is chaired by the Chairman of the Executive Committee, António Redondo, with Teresa Presas serving as Secretary-General. The board members, or internal members, are Ana Miranda, António Quirino Soares, Dorival Almeida, João Paulo Cabete Gonçalves Lé, Joaquim Poças Martins, José Fernando Morais Carreira de Araújo, Margarida Tomé, Maria da Conceição Cunha, Nuno Miguel Moreira de Araújo dos Santos and Vítor Paranhos Pereira.

The following prominent figures, connected to the activities of the Company's principal Stakeholder groups, are external members of the Sustainability Forum: Filipe Duarte Santos, Francisco Ferreira, Francisco Gomes da Silva, José Júlio Norte, Luís Neves da Silva, Rosário Alves, Assunção Cristas, Rita Nabeiro and Filipe Santos.

During the financial year 2025, two sessions of the Sustainability Forum were held: one internal session, attended by permanent members of the Forum, members of the Board of Directors, and officers and staff from various areas of Navigator's activities; and one external session, with the participation of a broad range of the Company's Stakeholders. The internal session of the Forum took place at Herdade de Espirra on 3 June, under the theme "Celebrating 10 Years of Sustainability Governance at Navigator", whilst the external session took place in Lisbon on 4 November, dedicated to the theme "The Business Case for Sustainability in a Changing World".

ETHICS AND INTEGRITY COMMITTEE

The Company has a Code of Ethics and Conduct applicable to all of its activities, the implementation and monitoring of which are ensured by the Ethics and Integrity Committee, which annually produces a report on compliance with the principles and standards set out therein. That report must set out all irregular situations of which the Committee is aware, as well as the conclusions and follow-up measures adopted in respect of the cases examined.

During the financial year 2025, the Ethics and Integrity Committee was composed of Henrique Reynaud Campos Trocado, Jaime Alberto Marques Sennfelt Fernandes Falcão and Rui Tiago Trindade Ramos Gouveia. Following the resignation submitted by Jaime Falcão, the Board of Directors resolved, at its meeting of 19 February 2026, to appoint José Manuel Vairinhos Gonçalves as a member of the Ethics and Integrity Committee, to complete the current mandate.

The Ethics and Integrity Committee is responsible for monitoring, with impartiality and independence, the Corporate Bodies of the Company in the dissemination and compliance with the Code of Ethics across all companies of the Navigator Group.

In the performance of its duties, the Ethics and Integrity Committee is specifically responsible for:

a) Verifying that the Code of Ethics and Conduct is integrated into the Company's usual internal control systems;

b) Reviewing the conclusions drawn by the Risk Management Department from any audits it conducts in respect of matters covered by the Code of Ethics and Conduct;

c) Ensuring the operation of a mechanism for reporting breaches of the Code of Ethics and Conduct, as part of the scope of the whistleblowing mechanism in force at the Company;

d) Examining and evaluating any situation arising in connection with compliance with the provisions of the Code of Ethics and Conduct involving any member of a Corporate Body;

e) Submitting to the Corporate Governance Committee any measures it considers appropriate in this regard, including the revision of internal procedures;

f) Submitting to the Board of Directors, where it considers it necessary, proposals for amendments to the Company's Code of Ethics and Conduct; and

g) Producing an annual report on its activities in the context of compliance with the standards set out in the Code of Ethics and Conduct across the companies of the Navigator Group.

In the performance of its duties, the Ethics and Integrity Committee may obtain information and reports produced by Ethics & Compliance on matters and initiatives relating to the Code of Ethics and Conduct.

The Ethics and Integrity Committee also acts as a consultative body to the Board of Directors on matters relating to the application and interpretation of the Code of Ethics and Conduct.

Pursuant to the Whistleblowing Regulations, whenever a report is received involving a member of the Board of Directors or of the Supervisory Board, the Ethics and Integrity Committee is notified accordingly.

In 2025, in addition to the routine work and communications carried out by electronic means, the Committee held one formal meeting, at which the activities carried out in 2024 were reviewed, and at which the activity report of the Ethics and Integrity Committee for the financial year ended 31 December 2024 was also discussed and approved.

RISK MANAGEMENT COMMITTEE

The Company has a Risk Management Committee, responsible for monitoring the implementation and operation of the Group's risk management system (ERM – Enterprise Risk Management), ensuring an integrated, continuous approach aligned with operations, with a view to the identification, assessment, monitoring and mitigation of the principal risks associated with the Group's activities.

The Committee comprises the Chief Executive Officer, the Chief Financial Officer, a non-executive Director appointed by the Board of Directors, the Risk Management Director, the Sustainability Director, the Legal and Public Affairs Director and the officer responsible for Empremédia – Corretores de Seguros (Insurance Brokers).

The competences and responsibilities of the Committee are as follows:

a) To assess and provide opinions on the risk management policy of The Navigator Company Group;

b) To supervise the implementation of the defined risk management policy, including the definition of risk appetite and the maximum tolerance levels to be observed;

c) To supervise the operationalisation of the Risk Management Model (ERM – Enterprise Risk Management) defined by the Group, in particular with regard to the inventory of risks and the selection of the principal business risks;

d) To anticipate the existence of new exogenous risks, in particular those relating to the use of new information technologies and artificial intelligence mechanisms;

e) To monitor the Company's principal risks, the level of actual risk exposure and its potential evolution;

f) To monitor the effectiveness of the mitigation plans for the Company's principal risks;

g) To monitor the implementation of the activity plans of the Risk Management Committee;

h) To take note of the risk management monitoring reports issued by the Risk Management Committee and to propose the adoption of such measures as are necessary or appropriate in light of those reports; and

i) To contribute to the promotion of a risk culture within The Navigator Company Group.

During the financial year 2025, in addition to the routine work and communications carried out by electronic means, the Risk Management Committee held one formal meeting, at which the principal risk trends and short- and long-term risk perspectives were analysed, the Group's risk taxonomy was updated, the Navigator 2025 risk matrix was reviewed and the evolution of the identified macro-risks was assessed. The risk treatment matrices, the key risk indicator dashboard (KRIs) and the ongoing work

relating to the implementation of the Business Continuity Management System were also analysed, with the need for regular monitoring of risk indicators and for the integration of different information sources into the ERM model being reinforced.

III. SUPERVISION
(Audit Board, Audit Committee or General Supervisory Board)

a) COMPOSITION*

30. Identification of the supervisory body (Audit Board, Audit Committee or General Supervisory Board) corresponding to the model adopted.

Under the one-tier management model adopted, the Company's supervisory body is the Audit Board and the Statutory Auditor, in accordance with section b) of no. 1 of article 413 of the Companies Code.

31. Composition, as applicable, of the Audit Board, the Audit Committee, the General and Supervisory Board or the Committee for Financial Affairs, indicating the minimum and maximum numbers of members and duration of their term of office, as established in the Articles of Association, number of full members, date of first appointment and end date of the term of office of each member; reference may be made to the item in the report where this information is contained in accordance with paragraph 18.

Pursuant to the Articles of Association, the Audit Board is composed of three full members, one of whom shall serve as Chairman, and one alternate member, with mandates of three years, which are renewable.

Name	Date of first appointment and end of Mandate
Maria da Luz Gonçalves de Andrade Campos (President)	2024-2027[113]
José Manuel Oliveira Vitorino (Full Member)	2016-2027[114]
Jorge Manuel Araújo de Beja Neves (Full Member)	2025-2027[115]
Gonçalo Nuno Palha Gaio Picão Caldeira (Full Member)	2007-2025[116]
Carla Alexandra de Almeida Viana (Alternate Member)	2025-2027[117]
Marta Isabel Guardalino da Silva (Alternate Member)	2024[118]-2025

The Company considers that the number of members of the Audit Board is perfectly adequate to its size and to the complexity of the risks inherent in its activities, efficiently fulfilling the functions entrusted to them. This adequacy assessment took into account, in particular, the Company's activities, the stability of the shareholder structure, as well as the diverse range of competences and the availability of the members of the Audit Board to perform their functions, namely through close collaboration with the other Corporate Bodies and Committees of the Company and the External Auditor and Statutory Auditor.

[113] Served as an alternate member from 2023 to 2024. Joined the Audit Board as a full member on April 22, 2024, and her term was confirmed at the General Meeting on May 24, 2024. Was elected President of the Audit Board at the General Meeting on May 29, 2025, for the 2025–2027 term.

[114] Served as an alternate member from 2015 to 2016. Joined the Audit Committee as a full member in 2016 and served as President from 2018 to May 2025. Was elected a full member of the Audit Board at the General Meeting of May 29, 2025, for the 2025–2027 term.

[115] Was elected as a full member of the Audit Committee at the General Meeting of May 29, 2025, for the 2025–2027 term.

[116] Early termination of duties due to resignation, effective May 29, 2025.

[117] Was elected Alternate Member of the Audit Committee at the General Meeting of May 29, 2025, for the 2025–2027 term.

[118] First appointment at the General Meeting of May 24, 2024. Termination of duties at the General Meeting of May 29, 2025, upon expiration of the term.

32. Identification, as applicable, of the members of the Supervisory Board, the Audit Committee, the General and Supervisory Board or the Committee for Financial Affairs who are deemed independent, in accordance with article 414 (5) of the Companies Code; reference may be made to the item in the report where this information is contained in accordance with item 19.

The members of the Audit Board Maria da Luz Gonçalves de Andrade Campos and Jorge Manuel Araújo de Beja Neves are considered independent, in light of the same criteria set out in No. 5 of Article 414 of the Companies Code, with the former serving her second mandate and the latter serving his first mandate.

José Manuel Oliveira Vitorino (Member), appointed at the annual General Meeting of 29 May 2025 to a fourth mandate as a member of the Audit Board, is a non-independent member of the said Corporate Body, as follows from the application of paragraph b) of No. 5 of Article 414 of the Companies Code. Gonçalo Nuno Palha Gaio Picão Caldeira, appointed at the annual General Meeting of 17 May 2023 to a fifth mandate as a member of the Supervisory Board, was a non-independent member of the said Corporate Body, as follows from the application of the aforementioned provision.

33. Professional qualifications, as applicable, of each of the members of the Audit Board, the Audit Committee or the General and Supervisory Board or the Committee for Financial Affairs and other relevant biographical details; reference may be made to the item in the report where this information is contained in accordance with item 21.

Maria da Luz Gonçalves de Andrade Campos
(President of the Audit Board)

Maria da Luz Campos holds a degree in Finance from the Lisbon School of Economics and Management (ISEG) and attended the Senior Business Management Programme (PADE) of AESE/IESE, as well as various specialist training programmes in the areas of finance and leadership. She developed her professional career at ANA, EP/S.A., where she held various senior positions, most notably as Administrative and Financial Director between 1995 and 2019, during which period she also held responsibilities in the Planning and Management Control Department (2003–2004). She served as Director and subsequently as Chairman of the Board of Directors of Portway Handling de Portugal (2002–2005) and as Audit Director of ANA, EP (1994–1995). She represented ANA on various international committees, including Eurocontrol and ACI (Airports Council International), and was a member of the Investment Committee of Futuro, Sociedade Gestora de Fundos de Pensões. She has extensive experience in financial management, auditing and strategic processes, having actively participated in ANA's financing strategy, the separation between airport management and air navigation management, as well as in the privatisation process of ANA, S.A. Since April 2024, she has served as a full member of the Audit Boards of Semapa – Sociedade de Investimento e Gestão, SGPS, S.A., The Navigator Company, S.A. and Secil – Companhia Geral de Cal e Cimento, S.A., having assumed the role of President of that Supervisory Body in May 2025.

José Manuel Oliveira Vitorino
(Full Member of the Audit Board)

José Manuel Vitorino holds a degree in Business Organisation and Management from the Instituto Superior de Economia of the University of Lisbon. He is qualified as a Statutory Auditor and completed the Executive Training Programme of Universidade Nova de Lisboa. He served as Assistant Professor at the Faculty of Economics of the University of Coimbra, where he remained until 1980, subsequently joining PricewaterhouseCoopers and dividing his activities between the areas of auditing and financial advisory, both in national and foreign companies and groups, and in projects in which he was part of international teams. He had been serving as a Partner for several years when he left PricewaterhouseCoopers in 2013, upon reaching the mandatory retirement age for that role. He also served as Chairman of the Audit Board of Novo Banco, S.A. until 2017, and serves as a member of the Audit Board of ANA – Aeroportos de Portugal, S.A. He has been a member of the internal control committee of Jerónimo Martins, SGPS, S.A. since May 2022. He has served as a full member of the Audit Board of The Navigator Company, S.A. since 2015, and of Semapa – Sociedade de Investimento e Gestão, SGPS, S.A. and Secil – Companhia Geral de Cal e Cimento, S.A. since 2016, having served as Chairman of those supervisory bodies between 2018 and 2025, and from 2025 onwards serving as a full member of the aforementioned Audit Boards.

Jorge Manuel Araújo de Beja Neves
(Full Member of the Audit Board)

Jorge Manuel Araújo de Beja Neves holds a degree in Business Organisation and Management from the Instituto Superior de Ciências do Trabalho e da Empresa (ISCTE), having completed his degree in 1983. He has been a qualified Statutory Auditor since 1990. He began his professional career at Sociedade Portuguesa de Seguros in 1982, joining Arthur Andersen in Lisbon in 1985, in the area of Auditing. Throughout his career at that firm, he was promoted to Manager in 1989 and to Partner in 1994. In 2002, following the integration of Arthur Andersen into Deloitte Portugal, he joined that firm, where he developed his career until 2018, having been responsible for leading the Porto office from 1998 until that date. He currently serves as Chairman of the Audit Board of Sport TV Portugal, S.A., as a member of the Audit Board of PreZero Portugal, S.A., and as managing partner of Glenash, Lda. He also served as a member of the Audit Board of Deloitte Central Services, S.A. and of Deloitte & Associados, SROC, S.A., positions which he no longer holds since May 2025. Throughout his professional career he has acquired relevant experience in the areas of auditing, internal control, corporate supervision and financial advisory, in the context of large national and international groups. He has served as a full member of the Audit Board of The Navigator Company since May 2025.

b) OPERATION

34. Existence of operating regulations, and place where they can be consulted, as applicable, of the Supervisory Board, the Audit Committee, the General and Supervisory Board or the Committee for Financial Affairs; reference may be made to the item in the report where this information is contained in accordance with item 24.

The Company's Audit Board has its own internal rules of procedure, which are published on the Company's website, in the Investors area, relating to Corporate Governance, and are freely available for consultation via the following link https://en.thenavigatorcompany.com/Investors/Governance.

The annual report issued by the Audit Board on its activities is published together with the Annual Report and is available on the Navigator Group's website.

35. Number of meetings held and rate of attendance at meetings of the Supervisory Board, the Audit Committee or the General and Supervisory Board and the Committee for Financial Affairs, as the case may be; reference may be made to the item in the report where this information is contained in accordance with item 25.

During the financial year 2025, the Audit Board held twenty-three meetings, including regular meetings established with the Risk Management Department, Ethics & Compliance, Planning and Management Control, the Accounting and Tax Department, the Finance Department and the Legal Department, with all respective agendas and minutes having been sent to the Chairman of the Board of Directors, and being likewise available to the Risk Management Department.

The members of the Audit Board ensured a high level of attendance at the meetings held during the period in which they served. All members were present at all meetings held during that period, with the exception of the instances indicated below, which were duly justified.

José Manuel Oliveira Vitorino was present at 20 of the 21 meetings held, corresponding to an attendance rate of 95%, and Gonçalo Nuno Palha Gaio Picão Caldeira was present at 8 of the 9 meetings held during the period in which he served, corresponding to an attendance rate of 88.9%. The remaining members recorded an attendance rate of 100%.

The number of Audit Board meetings held is freely available for consultation on the Company's website at https://thenavigatorcompany.com/en/investors/governance/.

In accordance with the Audit Board Regulations, detailed minutes are prepared of the respective meetings.

36. Availability of each of the members of the Audit Board, the Audit Committee or the General and Supervisory Board and the Committee for Financial Affairs, as the case may be, indicating offices held simultaneously in other companies, inside and outside the group, and other relevant activities carried out by the members of these bodies during the period; reference may be made to the item in the report where this information is contained in accordance with item 26.

Maria da Luz Gonçalves de Andrade Campos

Positions held in Navigator Group companies

The Navigator Company, S.A.	President of the Audit Board

Positions held in other companies / entities

Secil – Companhia Geral de Cal e Cimento, S.A.	President of the Audit Board
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	President of the Audit Board

José Manuel Oliveira Vitorino

Positions held in Navigator Group companies

The Navigator Company, S.A.	Member of the Audit Board

Positions held in other companies / entities

ANA – Aeroportos de Portugal, S.A.	Member of the Audit Board
Jerónimo Martins, SGPS, SA.	Member of the Internal Control Committee
Secil – Companhia Geral de Cal e Cimento, S.A.	Member of the Audit Board
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Member of the Audit Board

Jorge Manuel Araújo de Beja Neves

Positions held in Navigator Group companies

The Navigator Company, S.A.	Member of the Audit Board

Positions held in other companies / entities

Sport TV Portugal, S.A.	President of the Audit Board
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Member of the Audit Board
Secil – Companhia Geral de Cal e Cimento, S.A.	Member of the Audit Board
PreZero Portugal, S.A.	Member of the Audit Board
Glenash, Lda.	Director

Gonçalo Nuno Palha Gaio Picão Caldeira

Positions held in Navigator Group companies

The Navigator Company, S.A.	Member of the Audit Board[119]

Positions held in other companies / entities

Linha do Horizonte Investimentos Imobiliários, Lda.	Director

[119] Early termination of duties due to resignation, effective May 29, 2025.

Loftmania – Gestão Imobiliária, Lda.	Director
Secil – Companhia Geral de Cal e Cimento, S.A.	Member of the Audit Board[120]
Semapa – Sociedade de Investimento e Gestão, SGPS, S.A.	Member of the Audit Board [121]
Topologia II – SIC Imobiliária Fechada, S.A.	Director

C) POWERS AND RESPONSIBILITIES

37. Description of applicable procedures and criteria for the supervisory body's involvement in hiring additional services from the external auditor.

Pursuant to the rules established in the European Audit Regulation, in Article 77, Nos. 10 and 11, of the Statute of the Institute of Statutory Auditors, approved by Law No. 140/2015 of 7 September, in the Audit Board Internal Regulations, in the version currently in force, and in the Internal Regulations on the approval of non-audit services, approved on 1 June 2016, the engagement of services other than audit services - which are neither required by law nor constitute services prohibited to the External Auditor and Statutory Auditor or to any member of its network, by Navigator or by companies in a controlling or group relationship with it - is subject to the prior approval of Navigator's Audit Board, duly substantiated.

Accordingly, proposals submitted by the External Auditor are transmitted to the Audit Board for analysis and validation, with the aim of safeguarding, in particular: (i) that the services in question are permitted services; (ii) that the provision of such services does not affect the independence and impartiality of the External Auditor, which are necessary for the provision of audit services; (iii) that the cumulative value of fees received for the provision of non-audit services does not exceed the limit defined in the Statute of the Institute of Statutory Auditors; and (iv) that the additional services in question are provided with a high degree of quality and autonomy.

The Audit Board has thus applied the rules set out in the European Audit Regulation and in the Statute of the Institute of Statutory Auditors, approved by Law No. 140/2015 of 7 September, and observes the internal procedures established in the Internal Regulations on the approval of non-audit services, so as to ensure that the applicable legal provisions are complied with.

38. Other duties of the supervisory bodies and, if applicable, of the Committee for Financial Affairs.

1. The Audit Board has the competences conferred upon it by law, with no delegated powers or portfolios having been assigned. The functions and duties of the Audit Board are expressly set out in its Internal Regulations, which govern the exercise of its respective responsibilities, chairmanship, frequency of meetings, functioning and the framework of duties of its members, with detailed minutes being prepared of the respective meetings, and which may be consulted on the Company's website at https://thenavigatorcompany.com/en/investors/governance/.

In accordance with the Internal Regulations, revised in November 2025, the Audit Board ensures, in a timely and appropriate manner, the flow of information - including in particular the relevant notices of meeting and minutes - necessary for the exercise of the legal and statutory competences of each of the other Corporate Bodies and Committees.

2. In the performance of its duties, and without prejudice to any other competences conferred upon it by law, in particular under Article 420 of the Companies Code, in accordance with its Internal Regulations, the Audit Board is specifically responsible for:

[120] Termination of duties upon expiration of term, by resolution of the shareholders on July 28, 2025.

[121] Early termination of duties due to resignation, effective May 29, 2025.

a) Supervising the management of the Company, including, in this context, annually assessing the budget, the internal functioning of the Board of Directors and its Committees, as well as the relationship between the various Corporate Bodies and Committees of the Company;

b) Monitoring compliance with the law and the articles of association;

c) Verifying the regularity of the books, accounting records and supporting documents;

d) Verifying, when it considers it appropriate and in such manner as it deems adequate, the extent of cash holdings and the stocks of any kind of assets or securities belonging to the Company or received by it as security, deposit or on any other basis;

e) Verifying the accuracy of the financial reporting documents;

f) Verifying whether the accounting policies and valuation criteria adopted by the Company lead to a correct assessment of the Company's net assets and results;

g) Producing an annual report on its supervisory activities and providing an opinion on the report, accounts and proposals submitted by the Board of Directors;

h) Convening the General Meeting when the chairman of the relevant presiding board fails to do so, where such convening is required;

i) To take note of the strategic guidelines and to assess and provide an opinion on the risk policy prior to its final approval by the Management Body;

j) To supervise and assess the effectiveness of the internal control system, encompassing the risk management, compliance and internal audit functions, and to propose such adjustments as may prove necessary;

k) To provide opinions on the work plans and resources allocated to the internal control system services, including the risk management, compliance and internal audit functions, and to propose such adjustments as may prove necessary;

l) To receive reports of irregularities submitted by Shareholders, Employees of the Company or others;

m) To engage the services of experts to assist one or more of its members in the performance of their functions, with the engagement and remuneration of such experts taking into account the importance of the matters entrusted to them and the financial position of the Company;

n) To supervise the adequacy of the process of preparation and disclosure of financial and non-financial information by the Board of Directors, including the adequacy of accounting policies, estimates, judgements and relevant disclosures and their consistent application across financial years, in a duly documented and communicated manner;

o) To select the statutory audit firms to be proposed to the General Meeting for election and to provide a reasoned recommendation in favour of one of them, proposing the respective remuneration; the relevant selection process shall take place by means of invitations addressed by the Company to statutory audit firms identified as benchmark providers of statutory audit services, which shall in turn submit their respective proposals, to be subject to internal analysis by the Company in accordance with the following selection criteria:

   i. Quality of the proposals received;

   ii. Knowledge of the sectors in which the Navigator Group operates;

iii. Technical quality and seniority of the professionals involved in the proposing firms' teams; and

iv. Financial terms presented by each entity;

v. Demonstration that the firm has in place and has implemented internal mechanisms ensuring independence and the prevention of conflicts of interest;

p) To propose to the General Meeting the removal of the Statutory Auditor or the termination of its service contract whenever just cause exists for that purpose;

q) To supervise the statutory audit of the Company's financial reporting documents;

r) To supervise the independence of the Statutory Auditor, in particular with regard to the provision of additional services, and to annually assess the work performed by the Statutory Auditor and its suitability for the performance of the functions assigned to it;

s) To attest whether the report on corporate governance structure and practices that is disclosed includes the elements referred to in Article 29-H of the Securities Code;

t) To issue a prior and binding opinion on the Regulations on Conflicts of Interest and Related Party Transactions to be drawn up and approved by the Board of Directors or, in the absence of such regulations, on the determination to be made by the Board of Directors as to whether the transactions carried out by the Company with related parties are conducted in the ordinary course of its business and on market terms;

u) To issue, within a reasonable timeframe, a prior opinion on any transactions with related parties that are not carried out in the ordinary course of the Company's business and on market terms;

v) To verify that the related party transactions carried out by the Company are conducted in the ordinary course of the Company's business and on market terms; and

w) To fulfil such other duties as are set out in the law or in the articles of association.

In the exercise of these competences, in accordance with the Audit Board Regulations, the Audit Board ensures a structured and continuous monitoring of the Company's principal risks, through the regular analysis of information arising from the risk management, compliance and internal audit functions, the periodic review of internal control and risk management reports, as well as the holding of periodic meetings with the internal Departments responsible for these areas and permanent interaction with the Statutory Auditor, the Management Control Department, the Risk Management Department and Ethics & Compliance. This monitoring enables the Audit Board to assess, in a systematic manner and not only at formal or periodic junctures, whether the risks actually incurred by the Company remain aligned with the strategic objectives and the risk levels approved by the Management Body.

3. In accordance with its Operating Regulations, in the performance of its duties, and without prejudice to any other powers conferred upon them by law, the members of the Supervisory Board may, acting jointly or individually:

a) Obtain from the Board of Directors, for examination and verification, the books, records and documents of the Company, as well as verify the holdings of any class of assets, in particular cash, securities and merchandise;

b) Obtain from the Board of Directors, or from any individual Director, information or clarifications on the progress of the Company's operations or activities or on any of its transactions;

c) Have access to all information and Employees of the Company for the purposes of assessing the performance, position and development prospects of the Company, including, in particular, the minutes, the supporting documentation for decisions taken, the notices of meeting and the archive of meetings of the other Corporate Bodies, without prejudice to access to any other documents or persons from whom clarifications may be sought;

d) Obtain reports produced by the Company's internal control services, including with regard to the risk management, compliance and internal audit functions, in particular those on matters relating to financial reporting, the identification or resolution of conflicts of interest and the detection of potential irregularities;

e) Obtain from the Company's Statutory Auditor such clarifications as are necessary for the annual assessment by the Supervisory Board of the work performed by the Statutory Auditor, as well as of its independence and suitability to perform its functions;

f) Obtain from third parties who have carried out transactions on behalf of the Company such information as may be required for the proper clarification of such transactions; and

g) Attend meetings of the Board of Directors, whenever they consider it appropriate.

4. For the performance of its functions, the Supervisory Board may be assisted by specialists specifically appointed for that purpose and also by a firm specialising in audit work, and may resolve to engage the services of experts to assist one or more of its members in the performance of their functions.

5. In the performance of their duties, and without prejudice to any other obligations imposed upon them by law, in accordance with its Operating Regulations, the members of the Supervisory Board have a duty to:

a) Keep themselves informed and diligently prepare for meetings of the Board;

b) Participate in meetings of the Board and attend general meetings as well as meetings of the Board of Directors to which they are convened by its Chairman or at which the annual accounts are to be reviewed;

c) Exercise supervision in a conscientious and impartial manner;

d) Maintain confidentiality in respect of facts and information of which they become aware by reason of their functions;

e) Inform the Board of Directors of the verifications, supervisory activities and enquiries they have carried out and of the results thereof;

f) Report, at the first general meeting to be held, all irregularities and inaccuracies identified by them, as well as whether they obtained the clarifications they required for the performance of their functions;

g) Record in writing all verifications, supervisory activities, reports received and enquiries carried out, together with the results thereof;

h) Inform the Management Body of the results of the statutory audit and explain how it contributed to the integrity of the financial information preparation and disclosure process, as well as the role played by the Supervisory Body in that process;

i) Monitor the process of preparation and disclosure of financial information and present recommendations or proposals to ensure its integrity;

j) Supervise the effectiveness of the internal quality control and risk management systems and, where applicable, of the internal audit function, with regard to the financial information preparation and disclosure process, without prejudicing their independence;

k) Monitor the statutory audit of the individual and consolidated annual accounts, in particular its execution;

l) Verify and monitor the independence of the statutory audit firm in the exercise of its statutory audit activities or in the provision of other legally permitted services, within the terms defined under applicable law and regulations, in particular through:

i. Regular confirmation by the statutory audit firm that the aforementioned internal mechanisms remain adequate and compliant with applicable legislation and regulations;

ii. Annual receipt of a declaration as to its independence;

iii. Annual communication of non-audit services that have been provided;

iv. A reasoned proposal regarding the possible extension of the statutory audit firm's mandate beyond the maximum legal period, taking into account the relevant conditions of independence and the advantages and costs associated with its replacement;

v. Communication by the statutory audit firm regarding the exceeding of the fees threshold; and

vi. Joint analysis of any threats to its independence and of the application of safeguards to mitigate such threats;

m) Treat in a confidential manner all Company documentation to which they have access in the exercise of their functions, including the content of meetings of the Board and of the other Corporate Bodies in which they participate and of the preparatory information for such meetings; and

n) Make available to the other Corporate Bodies and Committees, as required by law and the articles of association, all information and documentation necessary for the exercise of the legal and statutory competences of each of those Bodies and Committees.

6. The members of the Audit Board must report to the Public Prosecutor's Office any criminal acts of which they become aware that constitute public crimes.

7. Whenever any member of the Audit Board becomes aware of facts revealing difficulties in the normal pursuit of the corporate object, they must immediately communicate such facts to the Statutory Auditor. The Audit Board is also the principal contact point of the External Auditor and Statutory Auditor, having direct access to and knowledge of the activities carried out by the latter. The Company believes that this direct supervisory role of the Audit Board, without interference from the Board of Directors, in relation to the work carried out by the External Auditor and Audit Auditor is achievable, provided that the timely and adequate knowledge of the management body - which bears ultimate responsibility for what occurs within the Company and for the financial statements - in respect of that same work is not prejudiced.

In observance of this principle, the reports of the External Auditor and Statutory Auditor are addressed to the Audit Board and discussed at joint meetings of that body with a member of the Board of Directors, at which the results of the statutory audit are set out, with the Audit Board ensuring that the conditions necessary for the provision of audit services are maintained within the Company. It is also incumbent upon the Audit Board to propose and monitor, with the support of the Company's internal services, the remuneration of the External Auditor and Statutory Auditor.

The Statutory Auditor also collaborates with the Audit Board with a view to providing, promptly and in accordance with applicable legal and regulatory requirements, information on material irregularities relevant to the performance of the Audit Board's functions that it has identified, as well as any difficulties encountered in the exercise of its functions.

Pursuant to the Audit Board Regulations, the Statutory Auditor and the Company maintain permanent and adequate channels of communication, in particular through the holding of regular meetings with the Board of Directors, with the Audit Board and with the Departments and Divisions bearing responsibilities in the relevant matters, and the consequent discussion and analysis of all information that is pertinent in the context of the exercise of the corresponding activity.

The Audit Board also maintains a close relationship with the Risk Management Committee. Indeed, in accordance with that Committee's Regulations, its Chairman must inform the Audit Board of any resolutions that, given their relevance, should be brought to its attention. Furthermore, all members of the Committee must be available to provide such clarifications and information as may be requested by the members of the Audit Board; notwithstanding, requests for information and clarification should preferably be submitted through the Chairman of the Committee. Finally, members of the Audit Board may be present at meetings of the Committee, at the request of its Chairman or at the request of the Audit Board, depending on the item on the agenda.

IV. STATUTORY AUDITOR

39. Identification of the statutory audit firm and the partner and statutory auditor representing the same.

The Company's Statutory Auditor is KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A., registered with the Portuguese Association of Statutory Auditors under No. 189 and registered with the CMVM under No. 20161489, represented by Rui Filipe Dias Lopes (Statutory Auditor No. 1715).

The alternate Statutory Auditor is Pedro Jorge Quental e Cruz (Statutory Auditor No. 1765).

40. Indication of the consecutive number of years for which the statutory audit firm has held office in the Company and/or Group.

The Statutory Auditor mentioned in point 39 has been working for the Company since 2018.

41. Description of other services provided by the statutory auditor to the company.

In addition to the statutory audit services provided to the Company and its subsidiaries, the Statutory Auditor also provided other assurance and reliability services, as well as financial information review services, in accordance with the provisions of Law No. 140/2015 of 7 September.

The amounts paid for these services throughout 2025 are detailed in points 46 and 47 below.

V. EXTERNAL AUDITOR

42. Identification of the external auditor appointed for the purposes of article 8 and the partner and statutory auditor representing such firm in the performance of these duties, together with their respective registration number with the Portuguese Securities Market Commission.

The Company's External Auditor is KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A., registered with the Portuguese Association of Statutory Auditors under No. 189 and registered with the CMVM under No. 20161489, represented in the fulfilment of those functions by partner Rui Filipe Dias Lopes (Statutory Auditor No. 1715).

43. Indication of the consecutive number of years for which the external auditor and the respective partner and statutory auditor representing the same in the performance of these duties has held office in the Company and/or Group.

The External Auditor and the respective Statutory Auditor representing it in the fulfilment of those functions were appointed at a General Meeting in September 2017, for the financial year commencing 1 January 2018. They were re-elected to the position at the annual General Meetings held on 9 April 2019 and 17 May 2023, and were reappointed on 29 May 2025. Accordingly, 2025 was the eighth year of the exercise of functions with the Company and/or the Group.

44. Policy on rotation of the external auditor and the respective partner and statutory auditor representing the same in the performance of these duties, and the respective frequency of rotation.

The policy and frequency of rotation of the External Auditor and Statutory Auditor and of its representative are determined by Article 54 of Law No. 140/2015 of 7 September (Statute of the Institute of Statutory Auditors), which enshrines the legal framework applicable to the mandatory rotation of Statutory Auditors in public interest entities, such as Navigator.

In 2025, upon a proposal by the Audit Board, which considered that the applicable legal conditions had been met, the reappointment of KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A. for the three-year period 2025–2027 as the Company's Statutory Auditor was approved by the Shareholders at the General Meeting, pursuant to the Statute of the Portuguese Association of Statutory Auditors and the maximum time limits for the exercise of statutory audit functions set out therein.

45. Indication of the body responsible for assessing the external auditor and the intervals at which this assessment is conducted.

In the context of its supervisory and auditing function in relation to the Company's financial reporting documents, including financial and non-financial information, the Audit Board evaluates the External Auditor and Statutory Auditor on a continuous basis and in particular in the context of the preparatory work for its Report and Opinion on the annual accounts.

The Audit Board, in addition to being responsible for proposing to the General Meeting the appointment of the Statutory Auditor and its respective remuneration, is the body responsible for evaluating and monitoring all audit work carried out by the External Auditor on a continuous basis, with the ability to propose its removal for just cause at the General Meeting, subject to the requisite formalities being observed. To that end, throughout the financial year, the Audit Board meets regularly with the Statutory Auditor and External Auditor, with a permanent and direct relationship being established between the two, with the latter being the principal recipient of the respective reports, including where matters relating to financial reporting and the detection of potential irregularities are concerned. At such meetings, the Audit Board may review all accounting and financial information it considers necessary at any given time, and may request from them any information it deems necessary for its supervisory purposes.

Additionally, the Audit Board, in the exercise of its supervisory functions, carries out an annual overall assessment of the performance of the External Auditor in the context of the preparatory work for its Report and Opinion on the annual accounts, and likewise supervises its independence, in particular through the obtaining of written confirmation of the auditor's independence; confirmation of compliance with the requirements for rotation of the responsible partner; and the identification of threats to independence and of the safeguard measures adopted to mitigate them.

To that end, the Audit Board has unrestricted access to the documentation produced by the Company's auditors, may request from them any information it deems necessary, and is the primary recipient of the final reports produced by the external auditors.

46. Identification of work, other than auditing, done by the external auditor for the company and/or for companies in a control relationship with it, together with internal procedures for approving the hiring of such services, specifying the reasons for doing so.

As described in point 47, in the financial year ended 31 December 2025, fees were invoiced by KPMG & Associados – Sociedade de Revisores Oficiais de Contas, S.A., statutory audit firm, and other entities belonging to the same network, in respect of the statutory audit of the annual accounts, limited review of interim accounts and assurance and other non-audit services. The breakdown of the fees invoiced for these services is set out in detail below, in point 47.

The services indicated as "assurance services" relate to the issuance of reports on financial information and to sustainability information verification services. With regard to other non-audit services, these relate to opinions on merger transactions within the scope of the Sole Auditor functions of Navigator Group companies, as well as agreed-upon procedures services on financial information. As noted above, these services do not fall within the list of prohibited services set out in Article 5(1) of Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014, the legal requirements of independence and threats thereto have been ensured, and the safeguard measures to limit such threats have likewise been ensured by the Auditor.

The provision of non-audit services by the Statutory Audit Firm to the Company and its subsidiaries is governed by the Internal Regulations on the approval of non-audit services, approved on 1 June 2016, which sets out non-audit services that may not be provided by the statutory audit firm and the prior control and authorisation processes for such services by the Audit Board. The framework defined in that internal regulation is fully consistent with the provisions of the Statute of the Portuguese Association of Statutory Auditors, approved by Law No. 99-A/2021, the Legal Framework for Audit Supervision, approved by Law No. 148/2015, and Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014.

Accordingly, the non-audit services provided by the External Auditor and Statutory Auditor were at all times approved by the Audit Board, in compliance with the applicable legal rules in force in 2025 and the internal procedures established for that purpose.s

47. Indication of the annual remuneration paid by the company and/or controlled, controlling or group entities to the auditor and other individuals or organisations belonging to the same network, specifying the percentage relating to the following services (for the purposes of this information, the concept of network is as defined in Commission Recommendation No. C [2002] 1873 of 16 May 2002).

By the Company *	Value (in euros)	Percentage
Value of audit services	552 226	87%
Value of reliability assurance services	83 750	13%
Value of tax consultancy services	0	0%
Value of services other than audits	0	0%

By Group Entities*	Value (in euros)	Percentage
Value of audit services	124 952	46%
Value of reliability assurance services	40 000	15%
Value of tax consultancy services	0	0%
Value of services other than audits	107 172	39%

* Including individual and consolidated accounts

In 2025, services other than auditing services billed to the Company or to entities in a controlling relationship with it by the External Auditor and Statutory Auditor, including entities in a holding relationship with them or which are part of the same network, represented 25% of the total services provided.

C. INTERNAL ORGANISATION

I. Articles of Association

48. Rules applicable to the amendment of the Company's Articles of Association (art. 29-H, no. 1, al. h) of the CVM).

The Articles of Association of the Company do not define any specific rules relating to their amendment, and accordingly the general framework arising from the Companies Code shall apply.

II. Reporting of Irregularities (Whistleblowing)

49. Means and policy for reporting of irregularities (whistleblowing) occurring in the company.

The Navigator Company, as a listed company with a rigorous governance system in place, has implemented a Whistleblowing Channel, made available through a portal accessible from its websites, thereby reinforcing the Company's objective of having an internal mechanism through which reports of irregularities are submitted to an effective, swift and suitable system for their detection, investigation and resolution, in compliance with the rules of conduct established by Navigator and with the principles of guaranteed anonymity, confidentiality, protection and non-retaliation in dealings with whistleblowers, in accordance with data protection and information security standards.

This Whistleblowing Channel is an independent service for reporting potential irregular practices, managed by an external entity on behalf of Navigator and intended for communications from Employees, Suppliers, Customers, Service Providers or any other interested parties, as set out in the Whistleblowing Regulations.

The Whistleblowing Regulations enshrine the general duty to report alleged irregularities occurring within the Navigator Group, contributing to its continued positioning as an upstanding, reputable and credible business group, as well as to its being a fair, honest and safe workplace.

Pursuant to the aforementioned Regulations, irregularities include violations of the rules established in the Code of Ethics and Conduct and other internal regulations, as well as non-compliance with external legislation or regulations to which The Navigator Company is subject (e.g. violations of rules of conduct or ethics, fraud, corruption and related offences, privacy and personal data protection, health and safety, environmental protection, Human Rights, among others).

The Regulations designate a multidisciplinary team with competence to follow up on reports received, known as the Irregularities Reporting Committee (IRC), comprising the Director of Legal and Public Affairs, the Risk Management Director and the Head of Ethics & Compliance, respectively. In cases where a report may concern any member of the aforementioned Committee, it is referred to the Audit Board.

The person responsible for following up on the report shall determine whether it contains the minimum grounds to trigger an investigation process, as well as determine the involvement of other Bodies, Departments or Employees where certain requirements are met.

Should the report meet the minimum grounds, the investigation process is initiated, which consists of verifying all facts necessary for the assessment of the alleged irregularity. This process concludes either with the archiving of the matter or with a proposal for the application of the measures most appropriate to the irregularity in question.

All persons with a conflicting interest in the matter under report are excluded from the investigation and decision-making process, so as to ensure that the receipt, triage, analysis and filing thereof are handled in an independent, autonomous and impartial manner.

Reflecting a proactive approach by our Stakeholders in identifying and reporting matters relevant to the Company, during the course of 2025 the Whistleblowing Channel received a total of 22 reports of irregularities, covering topics such as bullying, harassment or discrimination, health, safety and environmental protection, conflicts of interest and related party transactions, corruption, related offences, money laundering and international sanctions, taxation, competition and commercial practices, as well as matters relating to violations of policies or procedures, privacy and data protection, and food safety. Of these reports, only one was found to be substantiated, relating to a situation of harassment between Employees.

Notwithstanding the fact that all cases are identified and handled with due diligence, specific measures appropriate to its resolution were additionally taken in relation to the substantiated situation, with this Channel proving to be a vital tool for promoting a culture of transparency, accountability and compliance within the organisation.

Following the events that occurred in 2020 and 2021, underpinned by the 2020 criminal investigation relating to alleged corruption in the timber reception activity at one of our manufacturing sites, which led to the dismissal with just cause of the Employees involved in that activity, legal proceedings continue to be ongoing in the employment and criminal jurisdictions. Indeed, during 2025, Navigator continued to monitor, before the competent employment courts, the judicial challenges to the regularity and lawfulness of the dismissals of 28 Employees, with no further developments in those proceedings having occurred to date. In the criminal jurisdiction, Navigator, as an assistant party, continues to monitor the proceedings, which remain at the trial stage.

III. Internal control and risk management

50. People, bodies or committees responsible for internal audits and/or implementation of internal control systems.

The management and supervisory bodies of the Company have attached growing importance to the development and improvement of the internal control and risk management systems of the Navigator Group.

During 2023, the Group refined its internal risk management process through the implementation of a new Enterprise Risk Management (ERM) tool, aligned with the guidelines of COSO – the Committee of Sponsoring Organisations of the Treadway Commission and the ISO 31000 Standard. The implementation of this tool was carried out in conjunction with the various Departments of the Group, initially focusing on the Pulp and UWF Paper business lines.

In 2024, the ERM was extended to the new businesses, namely the Tissue Paper and Packaging businesses. This tool has brought about greater alignment with the Group's strategy and objectives, as well as targeted and continuous risk monitoring, with the responsibilities of the various participants in the process clearly defined.

In 2025, the Group reinforced the integration between the risk management process and the business continuity approach, ensuring a cross-cutting view of the principal strategic, operational and disruptive risks, and contributing to the strengthening of organisational resilience and the sustainability of the Group's operations.

In this context, the Risk Management Governance Model of the Navigator Group was refined through the creation of two additional bodies: the Risk Managment Committee and the Risk Oversight Committee.

The Governance Model is aligned with the IIA – Institute of Internal Auditors Three Lines Model, which involves: (1) in the first line, all business units responsible for carrying out day-to-day risk management activities; (2) in the second line, the Chairman of the Executive Committee, the Risk Management Department, Ethics & Compliance, Empremédia – Corretores de Seguros, the

Sustainability Department and the Risk Management Committee; (3) in the supervisory line, the Audit Board, the Risk Oversightg Committee and Internal Audit.

The internal control and risk management system is based on a systematic and explicit assessment of business risks by all organisational departments of the Navigator Group and the identification of the principal controls existing across all business processes. This foundation will enable the Company to continuously assess the adequacy of its internal control system in relation to the risks considered most critical at any given time.

As part of this periodic assessment, an annual internal audit programme is established, to be carried out by the Internal Audit department (Risk Management Department) in conjunction with each department involved, in order to monitor and assess the adequacy of the aforementioned internal control system in relation to the perceived risks and to support the organisation in implementing improvement programmes for that same system.

The External Auditor verifies the effectiveness and functioning of the internal control mechanisms, within the scope of its statutory audit work, and reports any deficiencies to the Audit Board.

Within the framework of the Governance Model adopted for Risk Management, the responsibilities of the principal participants are set out below.

BOARD OF DIRECTORS

The responsibilities of the Board of Directors in this regard are:

a) To review and approve the risk management policy defined for The Navigator Company Group, including risk appetite and risk tolerance;

b) To set objectives with regard to risk-taking and to ensure their pursuit;

c) To approve the risk management governance model adopted by The Navigator Company Group;

d) To supervise the application of the risk management policy within The Navigator Company Group;

e) To discuss and approve the strategic plan, which shall include the definition of risk levels considered acceptable;

f) To approve strategies to address risks, in particular very high risks; and

g) To promote a risk culture within The Navigator Company Group.

AUDIT BOARD

The competences and responsibilities of the Audit Board in this regard are:

a) To supervise and assess the effectiveness of the internal control system, encompassing the risk management, compliance and internal audit functions, and to propose such adjustments as may prove necessary;

b) To assess and propose improvements to the risk management and internal control model, processes and procedures;

c) To monitor the implementation of activity plans in the context of risk management and internal control;

d) To take note of the strategic guidelines and to assess and provide an opinion on the risk policy prior to its final approval by the Board of Directors, proposing and implementing periodic control mechanisms and procedures with a view to ensuring that the risks actually incurred by the Company are consistent with the objectives set by the Management Body;

e) To provide opinions on the work plans and resources allocated to the internal control services, including the monitoring of compliance with the rules applicable to the Company and of internal audit;

f) To take note of the internal control and risk assessment reports issued by the statutory audit firm and to propose the adoption of such measures as are considered necessary or appropriate in light of those reports;

g) To take note of the risk management monitoring reports issued by the Risk Management Department and to propose the adoption of such measures as are considered necessary or appropriate in light of those reports, with regard to internal control;

h) To take note of and provide opinions on the activities carried out in this regard by the Risk Management Department, on the resources allocated to the services that also perform internal control functions, being the recipient, where they exist, of reports or opinions produced by these services where matters relating to financial reporting, the identification or resolution of conflicts of interest and the detection of potential unlawful acts and irregularities are concerned; and

i) To receive reports of irregularities submitted by Shareholders, Employees of the Company or others, pursuant to the Whistleblowing Regulations in force.

RISK OVERSIGHT COMMITTEE

The competences and responsibilities of the Risk Oversight Committee are:

a) To assess and provide an opinion on the risk management policy of The Navigator Company Group;

b) To supervise the application of the defined risk management policy, including the definition of risk appetite and the maximum tolerance levels to be observed;

c) To supervise the operationalisation of the Risk Management Model (ERM – Enterprise Risk Management) defined by the Group, in particular with regard to the mapping of risks and the selection of the principal business risks;

d) To anticipate the existence of new exogenous risks, in particular those related to the use of new information technologies and artificial intelligence mechanisms;

e) To monitor the Company's principal risks, the level of actual risk exposure and its potential evolution;

f) To monitor the effectiveness of the mitigation plans for the Company's principal risks;

g) To monitor the implementation of the Risk Management Committee's activity plans;

h) To take note of the risk management monitoring reports issued by the Risk Management Committee and to propose the adoption of such measures as are considered necessary or appropriate in light of those reports; and

i) To contribute to the promotion of a risk culture within The Navigator Company Group.

INTERNAL AUDIT

The responsibilities of Internal Audit in this regard are:

a) To define a systematic and disciplined approach to assessing the effectiveness of the internal control system, encompassing the risk management and compliance functions, and to propose such recommendations as may prove necessary;

b) To define and implement the annual audit plan in the context of risk management and internal control;

c) To test risk management and internal control procedures and propose improvements; and

d) To regularly report the status of audits, as well as the principal findings of audits carried out, and to propose improvement recommendations in light of those reports.

CHAIRMAN OF THE EXECUTIVE COMMITTEE

The responsibilities of the Chairman of the Executive Committee in this regard are:

a) To define the risk management policy of The Navigator Company Group, including risk appetite;

b) To take into account the risk management policy when defining the strategic objectives of the Navigator Group;

c) To make available the means and resources necessary for the effectiveness and efficiency of risk management;

d) To approve the risk management model, processes and procedures;

e) To define the risk management governance model to be adopted by the Navigator Group, including the responsibilities to be assigned;

f) To approve activity plans in the context of risk management;

g) To ensure that the principal risks to which The Navigator Company Group is exposed are identified and reduced to acceptable levels, in line with the defined risk appetite and risk tolerance;

h) To discuss and approve risk treatment options where the residual risk level exceeds the risk tolerance levels;

i) To monitor and review the work carried out by the Risk Management Department in the context of risk management; and

j) To report results to the Board of Directors.

RISK MANAGEMENT DEPARTMENT

The responsibilities of the Risk Management Department in this regard are:

a) To propose the risk management policy, standards and procedures and their respective revisions;

b) To define the risk management methodology, processes and procedures;

c) To draw up activity plans in the context of risk management;

d) To identify and implement means and resources (human, procedural and technological) that facilitate the identification, analysis and management of risk;

e) To flag potential risks in the definition of strategic and operational objectives;

f) To drive and monitor the process of risk identification, analysis, assessment and treatment by risk owners;

g) To provide support in defining risk appetite and risk tolerance;

h) To provide support in defining the responsibilities to be assigned in the context of risk management;

i) To provide support in the identification and characterisation of risks;

j) To monitor risk indicators;

k) To provide support in defining risk mitigation measures;

l) To assess the effectiveness of risk mitigation measures;

m) To assess compliance with risk tolerance;

n) To ensure compliance with risk mitigation action plans; and

o) To produce risk management monitoring reports.

ETHICS & COMPLIANCE

In line with the evolution of international best practices, Navigator has established an Ethics & Compliance function, reporting hierarchically to the Executive Committee, in the person of the Chief Compliance Officer (CCO) and Compliance Officer, underscoring the importance of pursuing a compliance policy that frames its activity throughout the entire value chain, legal and regulatory, in a logic of transparency and fairness, in the context of the prevention and combating of unlawful acts.

Navigator thus regards as a structural element for the adequate management and mitigation of the compliance risks associated with its businesses and economic activities the existence of a system that promotes legal compliance and ethical conduct.

The compliance system aims to ensure adherence to applicable legal requirements, in particular from the perspective of the prevention of corruption, money laundering, terrorist financing, violations of international sanctions, the protection of Human Rights and the protection of personal data, as well as to reinforce the ethical culture of the Company and of several of its Stakeholders, namely Members of Corporate Bodies, Employees and Suppliers, through the promotion of training and communication initiatives on matters of legal compliance and ethical conduct.

This system is crucial to enable the Company to have adequate capacity to pursue its activities in compliance with the applicable legal requirements in the aforementioned areas and to promote ethical conduct on the part of the relevant Stakeholders, fostering respect for the most appropriate standards and practices for the decision-making process, in the context of the challenges posed by the business environment, whilst also contributing to value creation and the sustainability of the Navigator Group.

To achieve these objectives, the compliance system is aligned with the following fundamental organisational dimensions of the Group:

a) The governance model established in the respective articles of association and in the internal regulations of the management and supervisory bodies;

b) The business strategy and objectives, in particular through a focus on the prevention, detection and remediation of non-compliances that may impact its economic and financial value;

c) The risk management and internal control system, to enable the second line of defence of the COSO (Committee of Sponsoring Organisations of the Treadway Commission) model to incorporate and act effectively in the management of the compliance risks to which the Company is exposed; and

d) The organisational culture, to promote the assimilation of the importance of compliance matters for the functioning, resilience and reputation of the organisation and, simultaneously, to encourage the adoption of conduct that minimises the tangible and intangible costs of non-compliance for the Company and its people.

In order to render its compliance system effective, Navigator has implemented an efficient and effective compliance system governance model, which clearly identifies the competences of the various participants involved in the processes associated with its activity and fosters adequate coordination and communication between them, based on simple processes and procedures guided by business objectives, so as to avoid bureaucratisation and loss of agility in business development.

The structure and organisation of the Navigator Group's compliance system is based on the coordinated action of the functional units of the Group's internal structure, in articulation with the management and supervisory bodies and in accordance with generally accepted best practices, with a view to supporting the decision-making process.

With regard to the prevention of corruption and related offences, and compliance with the General Regime for the Prevention of Corruption and Related Offences (RGPC) in particular, the Company has one of its executive Directors acting as Compliance Officer and the Head of Compliance acting as the person with overall responsibility for the Execution, Control and Review of the Corruption and Related Offences Risk Prevention Plan (PPR).

Also in this context, the Navigator Group has consolidated the Third-Party Integrity Verification process and has applied a set of procedures with a view to the adequate implementation of the policies in force, such as the prevention of market abuse and the protection of personal data, and the mitigation of risks identified in the PPR, so as to ensure a more transparent approach aligned with its ethical principles.

In the context of internal control and risk management, the responsibilities of Ethics & Compliance are as follows:

a) To prevent and detect situations of legal non-compliance or inadequate ethical conduct;

b) To present and coordinate the implementation of corrective or remediation measures in respect of situations of legal non-compliance or inadequate ethical conduct;

c) To draw up and propose a three-year plan for the development and updating of the compliance system, annually assessing the need to update or amend this plan;

d) To prepare and propose internal standards and procedures on compliance matters;

e) To carry out integrity assessments of third parties that have dealings with the Navigator Group;

f) To identify and manage compliance risks relevant to Navigator;

g) To define compliance guidelines;

h) To coordinate the activity of compliance agents and establish adequate communication and reporting mechanisms for their respective functions;

i) To promote training initiatives and other capacity-building activities on compliance matters for Employees, members of Corporate Bodies and other relevant Stakeholders;

j) To ensure compliance with the duties of periodic reporting to Supervisory Authorities and other requests from such entities, within the scope of their competence;

k) To support the Ethics and Integrity Committee in the handling of reports of irregularities relating to violations of the Code of Ethics and Conduct;

l) To monitor the handling of irregularities reported through the Whistleblowing Channel, by virtue of the integration of the Head of Compliance in the Irregularities Reporting Committee; and

m) To monitor the level of compliance of the companies of the Navigator Group.

EMPREMÉDIA – CORRETORES DE SEGUROS

As part of the review of the Risk Management Governance Model of The Navigator Company Group, it was decided to dissolve the former Patrimonial Risk Analysis and Monitoring Committee and to integrate this component into the current Governance Model, at the level of risk monitoring, to be performed by Empremédia, which is the Group company responsible for insurance management.

Accordingly, the responsibilities of Empremédia in this regard are to provide opinions on the risk prevention systems in force within the Group and to assess the adequacy of the risk insurance policies and the insurance policies in which they are reflected.

RISK MANAGEMENT COMMITTEE

To implement the Risk Management Model (ERM), the Risk Management Committee was established, comprising:

a) Chairman of the Executive Committee

b) Chief Financial Officer

c) Representatives of each monitoring area (Risk Management Department, Legal and Public Affairs Department, Sustainability Department and Empremédia – Corretores de Seguros)

d) Representatives of each of the defined Sub-Committees (Commercial, Productive, Resilient, Capacity-Building and Reputational)

The responsibilities of the Risk Management Committee are:

a) To assess and provide an opinion on the risk management policy;

b) To propose the definition of risk appetite and the maximum tolerance levels to be observed;

c) To review and approve the risk mapping;

d) To review the Group's risk matrix;

e) To monitor the progress and effectiveness of the action plans for mitigation measures;

f) To monitor risk indicators;

g) To assess the effectiveness of the risk management process;

h) To define the persons responsible for the identified risks;

i) To promote coordination between different areas and subsystems of Risk Management; and

j) To regularly report to the Executive Committee and the Risk Management Commission on its activities and decisions.

BUSINESS AREAS/DEPARTMENTS

The responsibilities of the Business Areas/Departments in this regard are:

a) To participate in the process of risk identification, analysis, assessment and treatment;

b) To define risk tolerance;

c) To identify and characterise risks;

d) To define and monitor risk indicators;

e) To define, implement and execute risk mitigation measures, in accordance with the risk mitigation action plans; and

f) To carry out risk and control assessments.

51. Description of the lines of command in this area in relation to other bodies or committees; an organisational chart may be used to provide this information.

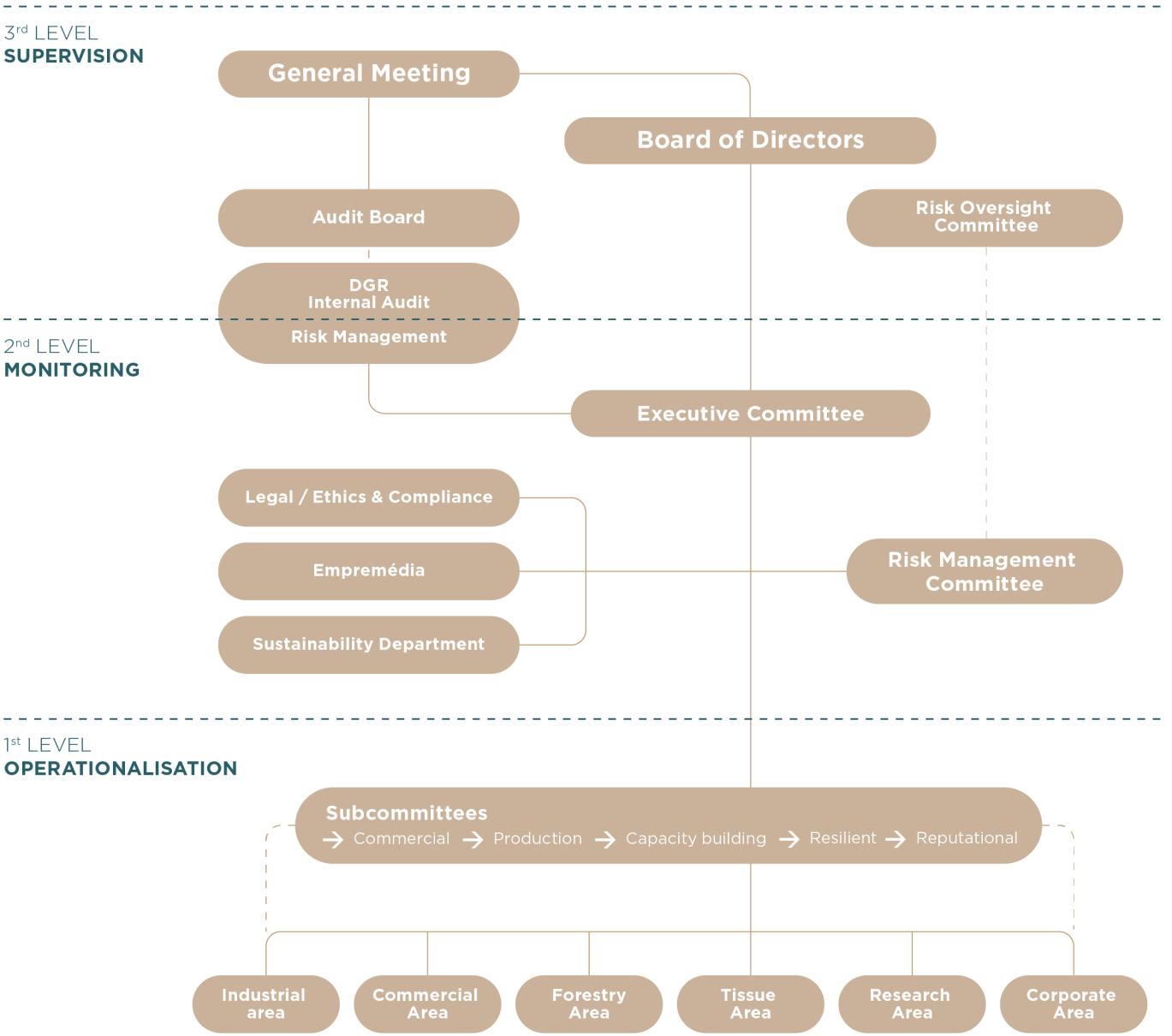
The organisational and governance structure for internal control and risk management is based on the IIA – Institute of Internal Auditors Three Lines Model, as represented in the figure below. This model ensures that:

- The first line is responsible for the day-to-day management of risks and internal control activities. Those responsible for risks and internal control activities must perform their daily functions in accordance with the business strategy and internal policies, standards and procedures, including the Risk Management Policy of The Navigator Company Group;

- The second line is responsible for defining the compliance, sustainability and risk and internal control standards and verifying their implementation across the organisation, as well as challenging the risk identification and assessment carried out by the first line and regularly monitoring risk levels;

- The third line supervises, controls and assesses the effectiveness of the risk management and internal control processes and monitors the efficiency and effectiveness of risk mitigation measures.

In terms of hierarchical and functional framework, it is important to highlight that Internal Audit (Risk Management Department), in addition to reporting functionally to the CEO, reports hierarchically to the Audit Board, thereby ensuring the necessary support for the proper discharge of its competences. These relationships are represented schematically in the organisational chart that follows:


3rd LEVEL
SUPERVISION
General Meeting
Board of Directors
Audit Board
Risk Oversight Committee
DGR
Internal Audit
Risk Management
2nd LEVEL
MONITORING
Executive Committee
Legal / Ethics & Compliance
Empremédia
Sustainability Department
Risk Management Committee
1st LEVEL
OPERATIONALISATION
Subcommittees
Commercial
Production
Capacity building
Resilient
Reputational
Industrial area
Commercial Area
Forestry Area
Tissue Area
Research Area
Corporate Area
LABEL:
Direct communication

52. Existence of other divisions with responsibilities in the field of risk control.

The following Committees exist within the Company to complement the activities of the Audit Board and the CEO with regard to the control and monitoring of specific risks:

a) Corporate Governance Committee – supervises the application of the Navigator Group's Corporate Governance standards and its Code of Ethics, and oversees the internal procedures relating to conflicts of interest matters, in particular with regard to relations between the Navigator Group and its Shareholders or other Stakeholders.

b) Ethics and Integrity Committee – supervises compliance with the provisions of the Code of Ethics and identifies situations that may hinder such compliance.

c) Talent Committee – is responsible for monitoring and supporting the appointment of senior management of the Company and the Navigator Group, as well as for assessing the performance of senior management.

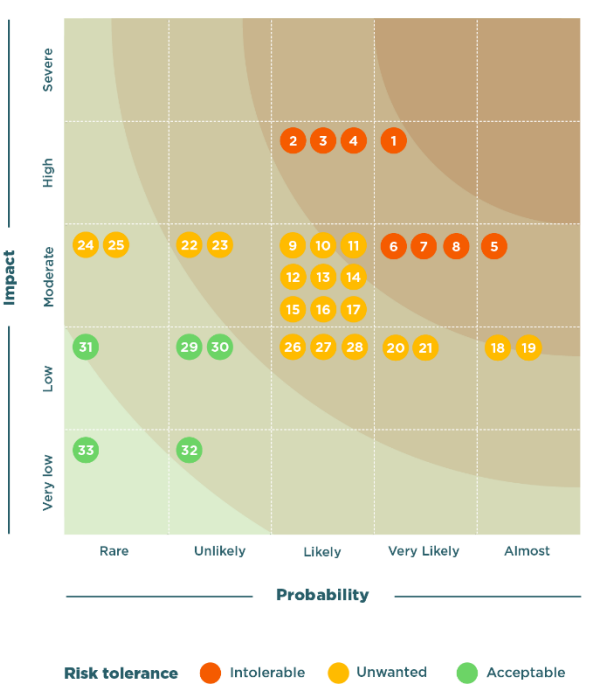
d) Sustainability Forum – implements the corporate and strategic policy on matters of social and environmental responsibility, and on the prevention of potential risks affecting such matters.

53. Identification of the main risks (economic, financial and legal) to which the company is exposed in the course of its business.

The Navigator Company Group has a Risk Taxonomy, a risk management support instrument that systematises the Group's principal risks, organised into 6 categories: strategic, financial, operational, compliance, technology and people (which include economic, financial and legal risks).

The Risk Taxonomy is a dynamic document, reviewed annually by the Risk Management Department to reflect changes in the organisation's internal and external environment. This approach ensures that risks are continuously identified, categorised and monitored in a consistent manner, enabling proactive management aligned with the Group's strategic objectives.

The matrix of principal risks, in terms of impact and probability of occurrence within the Navigator Group, is presented as follows:



#	Macro-risk
1	Cybersecurity and information systems
2	Access to wood
3	Talent management
4	Evolution of the regulatory environment
5	Adverse weather events
6	Access to utilities
7	Logistics chain
8	Restrictive tariffs and trade policies
9	Price volatility
10	Competitive environment
11	Fraud
12	Access to funding
13	External context
14	Occupational health and safety
15	Public perception
16	Productive efficiency
17	Disruptive technologies and artificial intelligence

#	Macro-risk
18	Financial markets
19	Biodiversity conservation
20	Consumption changes
21	Asset valuation
22	Knowledge management
23	Business diversification
24	Access to raw materials
25	Non-natural environment disasters
26	ESG performance
27	Climate transition
28	Customer satisfaction
29	Governance
30	Innovation management
31	Adverse labour situations
32	Investment decision-making
33	Customers credit

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
1 Cybersecurity and information systems (Technology Risk)	Risk of loss of security, confidentiality, transparency, integrity and availability of data and systems due to exposure to unauthorised access or new forms of cyberattacks or information theft, exploiting vulnerabilities in corporate and industrial control information technologies.	• Definition of the cybersecurity governance model; • Information security policies and procedures; • Cybersecurity incident response plan; • Access monitoring and control; • Penetration testing and security vulnerability analysis; • IT/OT asset registration and control; • *Third-party risk management*; • Regular cybersecurity training and awareness activities.
2 Access to wood (Operational Risk)	Risk of effective unavailability of timber due to regulatory or legislative restrictions (*e.g.* restrictions on eucalyptus planting) and failures in promoting the productivity, resilience and sustainability of national forests.	• Sustainable forest management through FSC and PEFC™ certification; • Promotion of chain-of-custody certification for all of the Group's timber suppliers; • Communication, education and *awareness-raising on eucalyptus among key Stakeholders*; • Development (RAIZ) and production (nurseries) of improved plants from a genetic improvement programme; • Prospecting for raw materials in domestic and international markets; • Preparation of an annual timber supply plan; • *Optimisation of timber inbound* flows; • Programme to promote the uptake by Producers of sustainable and certified forest management models; • Support programmes for forest Producers and for the enhancement of production forests.
3 Talent management (People Risk)	Risk of inability to attract, retain and develop talent to address departures of resources in critical or difficult-to-replace business areas, or to meet additional resource requirements.	• *Diversification of attraction strategies and employer branding*; • CRESCER Project; • Conduct of organisational climate studies; • Human resources development and talent management policy; • Human Rights Policy; • Gender equality plan; • The existence of a competitive career plan updated to meet existing needs; • Flexibility of the remote working model (partial arrangement); • Implementation of development, recognition and continuous improvement programmes (e.g. Future Leaders Forum, Future Leaders Board, Straight to the Top Programme); • Continuous training programmes tailored to the needs of Employees; • Succession strategy and plan for critical positions; • Adherence to the UN Global Compact.
4 Evolution of the regulatory environment (Compliance Risk)	Risk that regulatory changes arising from political decisions, notably at fiscal, environmental or economic level, significantly affect, directly or indirectly, the Group's operations and/or results.	• Monitoring of the most pressing topics on the political and regulatory agenda in Europe, Portugal and Mozambique; • Conducting advocacy initiatives by the Legal and Public Affairs Department, within regulatory, environmental and social frameworks; • Participation in national and international sector associations and events; • Business Round Table.
5 Adverse climate events (Operational Risk)	Risk associated with adverse climate events, whether of chronic origin (*e.g.* water stress) and/or acute origin (*e.g.* cyclones or floods).	• Identification and assessment of environmental risks and opportunities in accordance with national and international frameworks (e.g. TCFD) and their integration into decision-making processes; • Conducting studies and climate risk analyses at the principal manufacturing sites;

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
		• Environmental management system; • Sustainable forest management through certification under the FSC and PEFC™ systems; • Roadmap for carbon neutrality and decarbonisation targets approved by the SBTi – Science Based Targets initiative; • Gradual elimination of fossil fuel energy consumption and investment in renewable energy sources; • Natural capital insurance.
6 Logistics chain (Operational Risk)	Risk of non-existence or unavailability of sufficient logistical resources to operate, as a result of natural constraints (*e.g.* adverse weather) or market constraints (*e.g.* relocation of Suppliers).	• Diversification of Suppliers and means of transport; • Development of partnerships/services at nearby ports, ensuring regularity and stability of services; • Continuous monitoring of market prices, conducting regular supply tenders and requests for quotation; • Regular monitoring of the use of logistics resources.
7 Access to utilities (Operational Risk)	Risk of effective unavailability of *utilities* (*e.g.* water and energy) in industrial operations.	• Implementation of investment projects aimed at reducing water consumption at the Group's manufacturing complexes (e.g. PRUA); • Investments in the area of energy efficiency; • Decarbonisation plan; • Continuous monitoring of water and energy consumption; • Preventive maintenance strategy for assets; • Diversification of supply sources.
8 Tariffs and restrictive trade policies (Compliance Risk)	Risk of imposition of tariffs, quotas or other trade barriers affecting the competitiveness, production and exports of the Group in strategic markets.	• Regular monitoring of trade policies in the principal markets; • Diversification of the Customer and market base; • Inclusion of contractual adjustment clauses for tariffs or changes in trade policy; • Regular monitoring of legislation and technical barriers to entry in strategic markets; • Integration of commercial/geopolitical risk into strategic planning processes and overall risk analysis; • Scenario analyses and simulations (e.g. impact of +20% in tariffs in a specific market); • Regular monitoring of the effects of existing trade practices on the duties imposed on products sold.
9 Price volatility (Strategic Risk)	Risk of price or margin fluctuation arising from changes in market conditions.	• Continuous and proactive market monitoring, enabling assessment of short-term price expectations and understanding of long-term trends; • Frequent review of the gross margin calculation with the objective of monitoring the evolution of prices to Customers; • Focus on strategic markets; • Definition of marketing and branding strategies.
10 Competitive environment (Strategic Risk)	Risk of increased competitive pressures due, essentially, to the competitive positioning of producers with significantly lower production costs.	• Cost reduction policy; • Monitoring of innovation and process optimisation; • Diversification of products, markets and business segments; • R&D&I activities and investment in bioproducts; • Definition of marketing and branding strategies; • Provision of new Customer services (e.g. NVG Hub omnichannel platforms); • Monitoring of technological developments with Suppliers.

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
11 Fraud (Compliance Risk)	Risk of occurrence of fraudulent acts, corruption (*e.g.* conflicts of interest) and/or unethical conduct affecting the Group or third-party entities.	• Code of Ethics and Conduct; • Supplier Code of Conduct; • Regulation on conflicts of interest and related party transactions; • Definition of corruption prevention and related offences and compliance policies; • Internal and external audits; • Regular compliance training sessions.
12 Access to financing (Financial Risk)	Risk of unavailability of internal or external financing due to endogenous causes (*e.g.* over-indebtedness) or exogenous causes (*e.g.* contraction and negative business outlook, reduction in market liquidity).	• Group financing policy; • Minimum liquidity stock policy; • Definition and monitoring of compliance with financial covenants; • Diversification of funding sources (internal and external) and financing instruments.
13 External context (Operational Risk)	Risk of significant or disruptive changes in the Group's external context caused, for example, by the occurrence of pandemics (*e.g.* Covid-19), geopolitical conflicts and/or severe economic recession in key markets or at European/global level.	• Continuous assessment of the macroeconomic context; • Diversification of markets and Customers; • Diversification of Suppliers and raw material sources; • Solid capital structure; • Cost reduction policy; • Insurance coverage.
14 Occupational health and safety (Operational Risk)	Risk of workplace accidents and/or failure to protect the health of Employees as a consequence of non-compliance with safety procedures and rules, or the occurrence of unexpected public health events (*e.g.* Covid-19).	• Certified safety management systems (ISO 45001); • Continuous improvement plans; • Employee assistance programme and health and wellbeing initiatives; • Mandatory use of personal protective equipment (PPE) in the workplace; • Existence of occupational health and safety training programmes; • Internal and external emergency plans.
15 Public perception (Strategic Risk)	Risk of deterioration, inability to monetise or enhance the existing reputational capital over the medium to long term, as a result of reputation-damaging events or inaction in its management.	• Existence of various policies and standards to prevent irregular conduct or inappropriate behaviour, *supported by a governance structure involving the compliance* area and well-established reporting lines; • Implementation of regular Stakeholder consultation mechanisms; • Continuous investment in the brand awareness of the Navigator Group's brands; • Reinforcement of positioning and commitment to environmental sustainability topics; • Continuous reinforcement of the market's perception of the natural and sustainable origin of paper and other Navigator Group products; • Compliance with certifications and requirements for both purchased materials and manufactured products.

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
16 Productive efficiency (Operational Risk)	Risk of productive inefficiency caused by the occurrence of errors and/or failures in the production process.	• Benchmarking exercises aimed at optimising production; • Operational cost reduction policy; • Productive efficiency objectives; • Technical integrity assessments of principal facilities by external specialists; • Preventive maintenance strategy; • Predictive maintenance through digital initiatives utilising advanced analytics, sensors and process automation; • Existence of internal and external emergency plans; • Regular training for industrial teams; • Culture of continuous and on-the-job learning; • Investment in R&D&I; • Existence of a rigorous quality control system; • Implementation of safety stocks; • Internal and external audits.
17 Disruptive technologies and artificial intelligence (Technology Risk)	Risk associated with the use of artificial intelligence technologies.	• Internal training on the use of artificial intelligence technologies; • Definition of operating limits for artificial intelligence tools; • Human supervision of the performance of artificial intelligence tools; • Bias and social impact testing; • Personal data protection policy (in alignment with the GDPR); • Data confidentiality policy regarding the use of Navigator's data applied to all Stakeholders; • Approval of artificial intelligence tools for use in the Navigator Group, ensuring privacy and confidentiality; • Legal compliance verification.
18 Financial markets (Financial Risk)	Risk of exposure to unfavourable fluctuations in exchange rates and/or interest rates and applicable ratings, which negatively and materially impact the Group's financial results.	• Contracting of hedging instruments; • Definition of hedging strategies and exposure limits; • Daily monitoring of exposure by currency; • Definition of counterparty exposure limits; • Continuous monitoring of commodity prices.
19 Biodiversity conservation (Strategic Risk)	Risk of loss of genetic variety, species and ecosystems, compromising the resilience of natural resources, sustainability and compliance with legal requirements.	• Development of a biodiversity strategy; • Certification of sustainable forest management under the FSC and PEFC™ systems; • Assessment of natural values and potential impacts of operations, including their mapping, inventorying and evaluation of conservation status and condition; • Support programmes for forest Producers and enhancement of production forests; • Training for Suppliers and service providers on sustainable forest management practices; • Implementation of regular Stakeholder consultation mechanisms; • Carrying out of ecosystem restoration and rehabilitation projects.
20 Changes in consumption (Strategic Risk)	Risk of significant irreversible decline or discontinuity in the consumption of the Group's products or in its markets as a consequence of the emergence of alternative products and technologies.	• Development of a portfolio of quality products with innovative solutions; • Definition of marketing and branding strategies; • Diversification of markets and Customers; • R&D&I activities and investment in bioproducts; • Pursuit of market segments less sensitive to demand variations; • Monitoring of market trends.

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
21 Asset valuation (Operational Risk)	Risk of loss in asset valuation that materially impacts the value of the Group's balance sheet.	• Diversification of assets; • Maintenance of industrial and forestry assets; • Regular assessment of assets; • Periodic impairment testing.
22 Knowledge management (People Risk)	Risk of loss of accumulated knowledge within the Group (intellectual capital) driven by the departure of Employees in key roles with specific knowledge and/or experience, and by the absence of effective policies for sharing and transferring knowledge.	• Succession strategy and plan for critical positions; • Carrying out of organisational climate studies; • Rejuvenation programme; • Investment in training and the Learning Centre offering; • Digital transformation projects aimed at streamlining and simplifying processes.
23 Business diversification (Strategic Risk)	Risk of failure to identify opportunities for new businesses, products or processes.	• Development of market analyses and research, including market studies; • Definition of business diversification strategy; • Alignment of synergies between new opportunities and the core business; • Capacity building of internal teams; • Regular monitoring of progress against objectives and industry benchmarks.
24 Access to raw materials (Operational Risk)	Risk of effective unavailability of raw materials (*e.g.* chemicals) due to disruptions in supply chains.	• Prospecting for raw materials in domestic and international markets; • Partnership strategy with Suppliers; • Continuous monitoring of market prices, carrying out of supply tenders and regular requests for quotations from Suppliers; • Monitoring of the entire supply chain; • Specialist team exclusively dedicated to procurement; • Diversification of raw material supply sources; • Implementation of safety stocks based on the complexity of the logistics chain; • Existence of purchasing policies and procedures.
25 Non-natural environment disasters (Operational Risk)	Risk of occurrence of a serious environmental accident due to incidents of non-natural causes occurring at assets under the Group's responsibility, whether of internal or external origin, corresponding, for example, to the explosion of industrial equipment or the spillage of toxic and environmentally contaminating liquids.	• Existence of environmental operational control plans for the Group's industrial units; • Existence of factory maintenance plans; • Regular audits of industrial facilities; • Mandatory training and awareness-raising for Employees on safety and environmental matters; • Existence of internal and external emergency plans; • Fire detection and suppression systems; • Insurance coverage.
26 ESG performance (Strategic Risk)	Risk of poor strategic orientation in the management of ESG components with a significant impact on the Group's reputation and financial performance.	• Assignment and formalisation of responsibilities for ESG performance at senior management level; • Integration of ESG considerations into business management decision-making, including investment decisions; • Risk management framework aligned with international best practices; • Alignment and compliance of ESG reporting with global and regulatory frameworks (e.g. Global Reporting Initiative, SDG, TCFD, SBTi); • Continuous improvement of the reliability and quality of ESG information collection, control and validation systems; • Issuance of debt linked to sustainability criteria (e.g. green bonds and sustainability-linked loans).

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
27 Climate transition (Operational Risk)	Risk arising from the process of adapting to a low-carbon economy, namely the Group's inability to adapt to structural and long-term changes in technological, regulatory and market terms (*e.g.* changes in Consumer preferences).	• Monitoring of GHG emissions throughout the value chain and use of an internal carbon price in investment analysis; • Establishment of GHG emission and water reduction targets; • Alignment of investment decision-making and reporting with global and regulatory frameworks (e.g. TCFD, SBTi); • Decarbonisation plan.
28 Customer satisfaction (Operational Risk)	Risk of a reduction in the level of Customer satisfaction as a consequence of deterioration in product quality and/or service provision.	• Maintaining quality control and innovation standards; • Monitoring of market prices; • Definition of minimum thresholds for Customer service levels; • Provision of new Customer services (e.g. NVG Hub omnichannel platforms); • Carrying out of regular Customer surveys to assess satisfaction levels.
29 Governance (Strategic Risk)	Risk of incapacity or existence of unintentional failures in the Group's governance model.	• Responsible business conduct, grounded in ethics, accountability and transparency; • Codes of ethics and conduct for Employees and Suppliers; • Continuous assessments of Group Members and Directorates; • Implementation of diversity and independence within the Board of Directors and the Executive Committee; • Assessment and nominations committees; • Implementation of regular Stakeholder consultation mechanisms; • Risk management framework aligned with international best practices; • Supervision through internal and external audit; • Broad discussion forums (e.g. Sustainability Forum and Community Monitoring Forum).
30 Innovation management (Strategic Risk)	Risk of limited innovation activity with a transformative impact on the business, essentially due to a lack of focus on the effectiveness of R&D&I processes from the perspective of business orientation and impact.	• Implementation of a CapEx investment plan for continuous improvement and technological R&D objectives; • Investment in R&D&I; • Promotion of participation in collaborative projects / co-creation with external entities (R&D, Suppliers, Customers, innovative companies); • Active promotion of intellectual property valorisation; • Optimisation and automation of manufacturing and business support processes.
31 Adverse labour situations (Operational Risk)	Risk of occurrence of adverse labour situations, as a result of non-compliance with applicable labour legislation and/or inadequate management of labour relations with Workers, representative Workers' Organisations and Trade Unions.	• Compliance with laws and other regulations applicable to Workers; • Observance of employment legislation; • Development of occupational health and safety programmes; • Implementation and monitoring of the labour negotiation process; • Promotion of initiatives fostering equality/equity, diversity and inclusion; • Promotion of social dialogue with worker representative organisations and Trade Unions.
32 Investment decision-making (Strategic Risk)	Risk of difficulty in executing investments considered strategic and necessary for business development and operational efficiency.	• Monitoring and evaluation of market and industry trends; • Carrying out of investment analysis, including an integrated risk assessment; • Continuous monitoring of investment projects; • Regular cost control discipline; • Insurance coverage.

# Principal risks (non-exhaustive)	Summary Description	Principal Mitigation Measures
33 Customer credit (Financial Risk)	Risk of difficulty or inability to collect the full amounts extended as credit to Customers within the agreed timeframes.	• Formal Customer approval process by the Director with the commercial portfolio; • Contracting of credit insurance coverage for all transactions; • Existence of alternative mitigation measures (e.g. Cash In Advance, Cash Against Documents); • Continuous monitoring of Customers' exposure and overdues position.

The risks posed by climate change, alongside the evolution of ESG topics, have taken on particular prominence in the Navigator Group's risk management. In addition to being directly linked to Navigator's business processes, with described mitigation controls subject to monitoring, climate change is reflected on multiple fronts in our risk management structure. For example, the risk of access to raw materials or CO2 licences may, to a large extent, derive from drought phenomena or from the topics of (de)carbonisation of economies, which Navigator aims to anticipate and which are extensively addressed in another section of this Report.

54. Description of the process of identification, assessment, monitoring, control and management of risks.

Risk management represents for the Navigator Group an essential instrument for decision-making through the continuous monitoring of the risks to which it is exposed, raising awareness across the Group in a comprehensive manner of a risk culture that includes both the perspective of avoiding risks and the positive perspective of assuming risks.

Furthermore, the various Areas/Departments benefit from risk management through the ability to anticipate situations of uncertainty, mitigating the risks of adverse consequences and leveraging the risks that contain, in themselves, opportunities. A greater and more sustained decision-making capacity of the Navigator Group is also achieved in the face of risk events, responding in a coordinated and integrated manner to risks whose causes, impacts or vulnerabilities span more than one area.

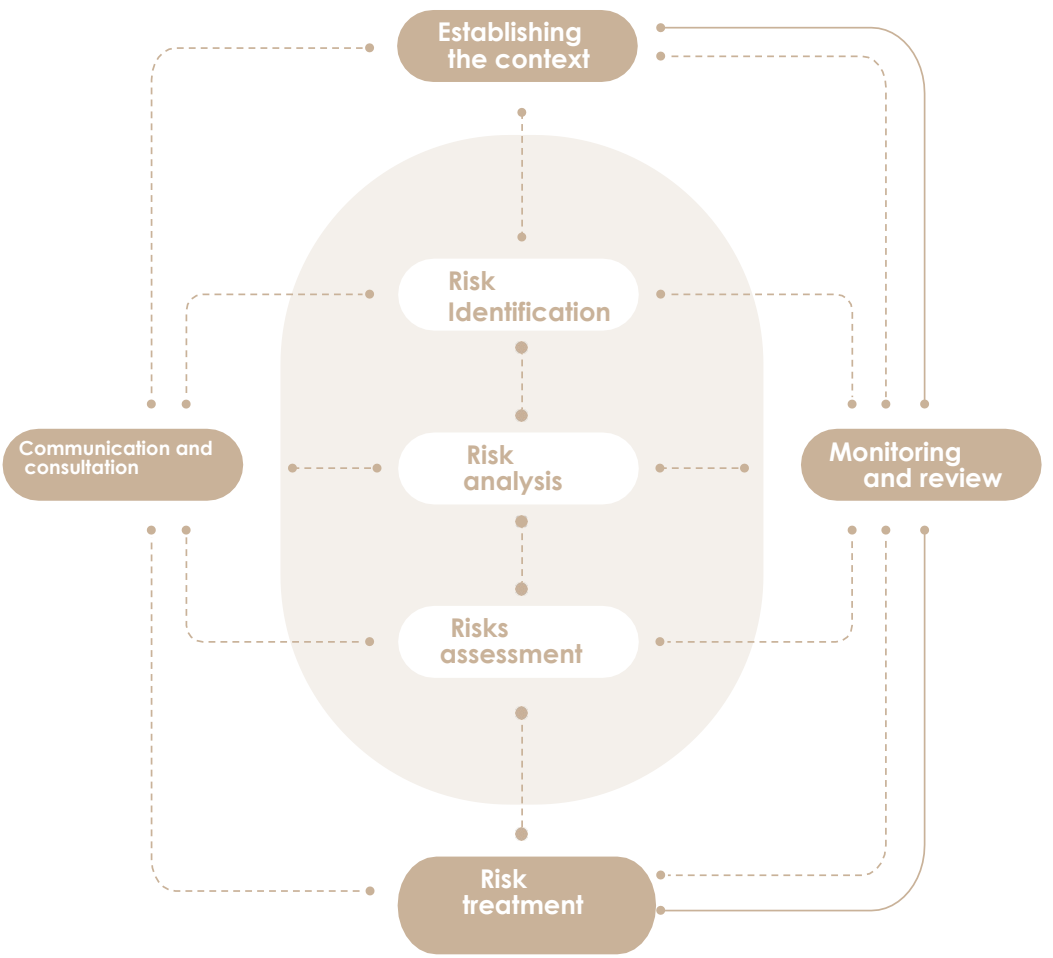
Finally, from the perspective of Internal Audit and the control environment, risk management assumes particular relevance through the possibility of continuously assessing the risk profile of the Navigator Group and reinforcing the level of internal control.

Equally relevant is the contribution of risk management to Internal Audit, directing its action towards the areas/processes of greatest risk and concern to the business – "Risk-Based Internal Audit". As an immediate result of this approach, it will be possible to plan and execute audit actions that take into account the most relevant risks for the Navigator Group, through a methodology for audit planning.

The Navigator Group's risk management process follows internationally accepted best practices, models and risk management frameworks, among which are COSO II – Integrated Framework for Enterprise Risk Management and the ISO 31000 standard.

Risk management in the Navigator Group is supported by the Risk Management Policy, which (i) establishes the principles, guidelines and responsibilities for the adequate identification, analysis, assessment, treatment and response to risks and (ii) ensures the convergence of risk management with the Group's strategic objectives, contributing to the promotion of a risk management culture within the organisation.

For the development of the risk management process, the ISO 31000 standard was taken into account with regard to its principal phases, and COSO II for the systematisation and structuring of risks. This process is composed of a set of seven interrelated phases, encompassing within itself an iterative process of continuous improvement, underpinned by a communication and consultation process and a monitoring and review process. The following figure schematically represents the flow of the risk management process.



Establishing the Context

The purpose of establishing the context is to define the scope of risk management and includes (i) the identification of the internal and external environments in which the Group operates and the assessment of potential changes in these environments, (ii) the identification of the organisational scope of risk management and (iii) the definition of a set of criteria against which risks will be assessed.

Identifying Risks

Risk identification is supported by the Risk Taxonomy, a risk management support instrument that systematises the Group's principal risks, organised into 6 categories: strategic, financial, operational, compliance, technology and people. This identification is complemented through meetings and workshops with the Business Areas, benchmark analysis of risks and market trends. At the level of information security, risk identification is also based on the analysis of internal and external vulnerabilities, investigation of cybersecurity incidents and internal and external audits carried out.

Analysing Risks

The objectives of this phase are to identify ways of mitigating the impact of the risk and the likelihood of its occurrence, as well as to define indicators that a risk event may be about to occur or may have already occurred. Risks are ranked and mapped in a risk matrix and mitigation measures are identified to minimise the likelihood of occurrence and/or the impact of the risk, which are compiled in risk registers. The risk matrix enables risks to be categorised and prioritised and supports the definition of additional mitigation measures that prove necessary. Following risk identification, the risk appetite is also defined, that is, the level of risk that the Group is willing to accept in order to achieve its strategic and business objectives. In this phase, risk indicators (KPI/KRI) are also defined, which function as early warning instruments and enable the anticipation of potential events and emerging risks.

Assessing Risks

Risk assessment is carried out in accordance with qualitative and quantitative assessment criteria, with regard to the likelihood of occurrence and the magnitude of the impact it may cause, measured on a five-level scale, in accordance with the risk appetite defined by the Navigator Group.

The risk level for each risk is calculated by multiplying the likelihood of occurrence by the impact in the event of occurrence. The likelihood of a risk occurring measures the number of times or the percentage that it may occur within a given period, and may be measured on the basis of historical information, expectation or frequency of occurrence. In turn, the magnitude of the impact measures the loss associated with the materialisation of a given risk and is assessed across six dimensions: (1) financial; (2) reputational; (3) compliance; (4) human capital; (5) environmental; and (6) information security. This process is reviewed annually or whenever justified by any change in business or context.

Treating Risks

Once risks have been identified and assessed, the decision-making process begins, through which the risk response strategy is determined and implemented, in accordance with the established risk appetite. The possible types of risk response are: accept; mitigate; transfer; avoid. The Risk Management Department monitors the implementation of risk response measures and reports their status to the Executive Committee, the Risk Management Committe, the Risk Management Commission and the Audit Board.

Communication and Consultation

Communication is an important element at each phase of the risk management process. The Risk Management Department produces periodic reports for internal and external Stakeholders, namely for the Risk Management Committee and the Risk Management Commission, on risk exposure, follow-up of mitigation measures and the evolution of KPIs and KRIs.

Monitoring and Review

The periodic monitoring and review of the risk management process is essential to ensure that this process remains effective, relevant and up to date over time. The Risk Management Department continuously monitors the evolution of the Group's risks, risk response measures and risk indicators, within the scope of the Group's annual risk management cycle.

The Risk Management Committee, the Risk Management Commission and the Audit Board are responsible for overseeing the risk management process, contributing suggestions for improvements or changes to risks, mitigation measures or risk indicators.

Additionally, Internal Audit provides independent assurance on the effectiveness of controls and recommends improvements whenever it considers necessary. In this context, during 2024, a set of internal control audits were carried out and open matters from previous audits were followed up. The work carried out this year focused primarily on internal control processes, namely the mapping of the principal organisational processes with identification of the respective risks and operational controls, the reinforcement of risk assessment and operational information systems in the cybersecurity component, analysis of pulp stock traceability processes and performance in terms of forest protection. Additionally, monitoring of the internal control matters

identified by the External Auditor continued.

The external audit is carried out by KPMG. The Company's External Auditor verifies the effectiveness and functioning of the internal control mechanisms through the information made available to it by the Company. The findings of the verifications carried out are reported by the External Auditor to the Audit Board which, where applicable, reports the deficiencies found.

55. Main components of internal control and risk management systems implemented at the company for the disclosure of financial information (art. 29-H, no. 1, para. l) of the CVM).

The Company has an internal control system relating to the preparation and disclosure of financial information, ensured by the Company's Departments/Business Areas, namely the Accounting and Tax Department, the Management Control Department, the Risk Management Department and the Investor Relations Department, and regularly monitored by the Audit Board.

Within the scope of this system, the Audit Board reviews financial information on a quarterly basis based on the reports prepared by the Department responsible and relying, on a half-yearly and annual basis, on the opinion issued by the Statutory Auditor (ROC) and External Auditor thereon. In this context, meetings are also held with the participation of the Risk Management Department, members of the Executive Committee, the Statutory Auditor and External Auditor, and those responsible for Accounting and Planning and Management Control, with a view to monitoring the processes underway. The elements of the internal control and risk management system are described in point 54.

IV. Investor support

56. Office responsible for investor support, composition, functions, information provided and contact details.

The Company has had an Investor Relations Office since 1995. The mission of this Office is to ensure permanent and adequate contact with the financial community – Investors, Shareholders, financial Analysts and regulatory Authorities - and to promote the communication of relevant information on the Company's performance, both historical and current performance and future strategy.

In accordance with principles of consistency, integrity, regularity, fairness, credibility and timeliness, it thus contributes to facilitating the investment decision-making process and the sustained creation of value for the Shareholder.

The Investor Relations Office is also responsible for monitoring all matters relating to the relationship with the Portuguese Securities Market Commission (CMVM), compliance with the legal obligations to report to the regulator and the market, as well as responding to information requests from Investors, both institutional and individual, domestic and foreign, and from financial Analysts who prepare opinions and formulate recommendations relating to the Company's shares.

The Investor Relations Office has the following composition:

Head: Ana Canha, who also performs the functions of Representative for Relations with the Market and with the CMVM, whose contact details are set out in the following section.

Team: Catarina Augusto

All mandatory information, such as information relating to the Company, its registered office and the other elements referred to in Article 171 of the Portuguese Companies Code, is available on the Navigator Group's website at www.thenavigatorcompany.com.

In addition to the mandatory information, available in Portuguese and English, the website provides a range of general information about the Group, namely:

- Financial information (presentations, disclosure of quarterly results and accounts and reports, annual reports and debt information);
- Insider information disclosures to the market and other disclosures;
- Information on the performance of Navigator's shares on the stock exchange and recommendations issued by analysts;
- Annual calendar of corporate events, including, among others, General Shareholders' Meetings and the disclosure of annual, half-yearly and quarterly accounts;
- Information relating to the Corporate Governance of the Company;
- The Navigator Company's Code of Conduct;
- Description of the Corporate Bodies, as well as the Company's Articles of Association;
- Regulations in force;
- Information relating to General Shareholders' Meetings, such as notices convening General Meetings, proposals submitted for discussion and voting at General Meetings, resolutions approved and attendance statistics;
- Minutes of General Shareholders' Meeting proceedings.

With the objective of providing the market with a clear, transparent and up-to-date view of the Company's strategy, both in terms of operational performance and future prospects, the Office organises and participates in various events. These events aim to present the Company's strategies and prospects to the market, as well as to monitor the development of activities throughout the year, clarifying any queries that may arise. In this way, an open dialogue is maintained with all Stakeholders throughout the year. Among the activities organised, the following are particularly noteworthy:

- Virtual and in-person meetings with financial Analysts and Investors;
- Responses to queries addressed to the Office, submitted via email to a dedicated address or by telephone;
- Virtual and in-person meetings with members of the management team, namely with the Group's CEO and CFO;
- Meetings with Investors held at the industrial complexes;
- Disclosure of market announcements through the CMVM and the sending of email messages to all Investors and financial Analysts contained in the database created and maintained by the Office;
- Telephone conferences for the presentation of quarterly results with Navigator's Executive Committee;
- Presentations to the financial community: results presentations, conferences and the annual General Shareholders' Meeting;
- Ongoing process of updating the Investors' Area on the institutional website.

Contacts:

Contact with the Office is possible through the Representative for Relations with the Market, the Company's general telephone contacts (+351 219 017 300) and the email address: investidores@thenavigatorcompany.com.

These contacts are available on the Navigator website, in the Investors' area.

57. Investor Relations Officer.

The Company's Representative for Relations with the Market is Ana Rosa Pinelo Esteves Canha and she may be contacted at the following email address: ana.canha@thenavigatorcompany.com.

These contacts are also available on the Navigator website, in the Investors' area.

58. Information on the proportion and response time to information requests during the year or pending from previous years.

Navigator is committed to ensuring proximity with the capital markets community through transparent, objective and consistent communication of the Company's strategy.

Throughout 2025, the Company was involved in ten dedicated events bringing together Investors, financial Analysts and other entities, including four telephone conferences for the presentation of results, attended by the Executive Committee, Analysts and institutional Investors, and two visits to our facilities, one to the Setúbal Industrial Complex and another to the Espirra Nurseries. These events resulted in a total of more than 160 meetings, of which 45 were in person.

In parallel, various monitoring meetings were held throughout the year with the 8 Analysts who provide coverage of Navigator's shares, as well as contacts and meetings with individual and institutional Investors.

Through electronic means (email and telephone contact), questions and requests were also directed to the Investor Support Office, with an average of 20 contacts per month, with approximately 240 requests received and responded to throughout 2025, with an estimated average response time of less than 3 working days. At the end of the year, there were no pending information requests.

V. Website

59. Address(es).

Navigator's website address is available in Portuguese and English:

- www.thenavigatorcompany.com
- www.thenavigatorcompany.com/en/

60. Location information on the company name, public company status, registered office and other items referred to in article 171 the Companies Code.

The above information is available on Navigator's website, in the Investors area, at https://en.thenavigatorcompany.com/Investors/Navigator-Share.

61. Location of the articles of association and operating regulations of boards and/or committees.

The above information is available on Navigator's website, in the Investors area, in the Corporate Governance section, at: https://en.thenavigatorcompany.com/Investors/Governance.

62. Location of information on the identities of members of statutory bodies, the investor relations officer and the Investor Support Office or equivalent structure, and their respective duties and means of access.

The aforementioned information is available on Navigator's website, in the Investors area, specifically in the section on Corporate Governance, as well as in the section entitled Profile, available, respectively, at:
https://www.thenavigatorcompany.com/en/investors/governance/
https://www.thenavigatorcompany.com/en/investors/investor-support-office/.

63. Location for consultation of financial statements and reports, which must be accessible for no less than

five years, together with the six-monthly corporate diary, disclosed at the start of each semester, including, amongst other things, General Meetings, disclosure of annual, half-yearly and (if applicable) quarterly accounts.

Navigator's quarterly, half-yearly and annual results, published since 2003, are available in the Investors area, in the section entitled 'Financial information', available at:

- https://www.thenavigatorcompany.com/en/investors/financial-information/

The calendar of company events for the current year has its own tab in the Investors area entitled 'Calendar', available at:

- https://thenavigatorcompany.com/en/investors/calendar/.

64. Location for publishing the meeting notice for the General Meeting and all preparatory and subsequent information related to it.

The notice for the General Meeting, as well as all the preparatory and subsequent information related to it, is available in the Investors' area, in a separate tab entitled "General Meetings", available at:

- https://en.thenavigatorcompany.com/Investors/General-Meetings.

65. Location for publishing a historical archive of decisions made at the company's general meetings, share capital representation and voting results for the 3 preceding years.

The aforementioned information is available in the same place as the information on General Meetings, *i.e.* in the Investors' area, in a separate tab entitled "General Meetings", available at:

- https://en.thenavigatorcompany.com/Investors/General-Meetings

D. REMUNERATION

I. Powers to determine remuneration

66. Indication of the powers for determining the remuneration of statutory bodies, members of the executive committee or managing director and company managers.

The body responsible for determining the remuneration of the Board of Directors and the Supervisory Board is the Remuneration Committee.

With regard to the Company's directors, this competence belongs to the Board of Directors.

II. Remuneration Committee

67. Composition of the Remuneration Committee, including identification of individuals or organisations contracted to provide support, and declaration regarding the independence of each member and adviser.

The Remuneration Committee is composed of Pedro Miguel de Araújo Raposo (Chairman), João do Passo Vicente Ribeiro and Carlota Infante da Câmara Albergaria Caldeira. Maria Eduarda Faria e Maia de Oliveira Luna Pais served as Chairwoman until the date of the 2025 annual General Meeting, having ceased her functions by resignation.

The Company considers all members of the Remuneration Committee to be independent.

The Remuneration Committee does not have any persons contracted to assist it. The Company may freely engage the services that prove necessary or convenient, within the Company's budgetary limits, a right which it has already exercised in the past, and

must in such cases ensure that the services are provided independently and that the respective service providers are not engaged to provide other services to the Company itself or to other companies in a controlling or group relationship without the express authorisation of the Committee. The Company considers that the composition of the Remuneration Committee ensures its independence from the Board of Directors, given that all of its members are independent.

In the Company, the Remuneration Committee provides all information or clarifications to Shareholders at the respective annual General Meetings or at any other General Meetings, if the respective agenda includes a matter connected with the remuneration of members of the Company's Bodies and Committees, or if such presence is requested by the Shareholders, doing so through the attendance of at least one of its members. This was the case at the annual General Meeting of 24 May 2024, at which all of its members were present.

68. Expertise and experience of the members of the Remuneration Committee in the field of remuneration policy.

Two of the current members of the Remuneration Committee, Pedro Miguel de Araújo Raposo and Carlota Albergaria Caldeira, as well as Eduarda Luna Pais (Chairwoman until May 2025), have extensive knowledge and experience in remuneration policy matters.

Pedro Miguel de Araújo Raposo developed an extensive career in the area of human resources and people management, having held, over more than three decades, management positions in large organisations of high organisational complexity, namely in the distribution sector, the banking sector and at Banco de Portugal, where he performed functions as Director of People and Strategy. In the course of these functions, he acquired relevant experience in the definition and implementation of remuneration policies, compensation and benefits systems, performance assessment and incentive models applicable to different organisational levels, including senior and executive management, having also attended specialist executive training in matters of executive body remuneration and governance of remuneration policies.

Carlota Albergaria Caldeira, in turn, has solid experience in human resources consultancy with a focus on managing executive search projects (domestic and international markets) and assessments, having, over several years, carried out various consultancy projects in companies providing services in the area of talent management and executive recruitment, such as Jason Associates, Argo Talents and Mercer. She was also a Senior Associate at Heidrick & Struggles, where she managed various Human Capital/Leadership Services consultancy projects.

Eduarda Luna Pais was, for several years, a consultant at Egon Zehnder and subsequently Office Leader and Partner of that firm, which has extensive experience and is a leader in executive recruitment, a role that involves deep and continuously updated knowledge of assessment processes and criteria and the associated remuneration packages.

III. Remuneration structure

69. Description of the remuneration policy of the management and supervisory bodies referred to in article 2 of Law no. 28/2009, of June 19.

The remuneration policy for the management and supervisory bodies ("Remuneration Policy") relating to the 2025 financial year, drawn up by the Remuneration Committee, was approved at the annual General Meeting of 17 May 2023, and corresponds to Annex 2 of this Report, there being no departure from the procedure for applying the approved remuneration policy or any derogations therefrom.

70. Information on the means of structuring remuneration to align the interests of managing board's members with the long-term interests of the company, and how this is based on performance assessment, discouraging the assumption of excessive risk.

The manner in which the remuneration of the corporate bodies was structured and the performance assessment of the executive management was based in 2024 respected the model and principles – functions performed, economic situation of the Company and market criteria – set out in the Remuneration Policy of the members of the management and supervisory body of Navigator in force, to which reference is made. In point 24 above, the process and the bodies involved in the performance assessment of executive Directors are described.

The remuneration system in force at Navigator ensures its business strategy and, in the long term, the alignment of the interests of the members of the management body with the interests of the Company and its sustainability, in particular by virtue of being a remuneration that seeks to be fair and equitable, within the scope of the principles set out, and by associating the members of the management body with results, through a variable component of remuneration in which results are the predominant factor, but which also takes into account the behavioural competencies of each Director, such as their alignment with the long-term interests of the Company and its sustainability.

With regard to the components of remuneration:

(a) Non-executive Directors

The remuneration of non-executive members of the Board of Directors consists solely of a fixed component, corresponding to an annual amount, payable 12 times per year, which may be differentiated by virtue of the accumulation of functions and additional responsibilities (for example, members of specialised Committees or Commissions, or a predetermined amount per attendance at each Board of Directors meeting). The remuneration of non-executive members of the Board of Directors does not include any component whose value depends on the performance of the Company or its value.

(b) Executive Directors

The remuneration of executive members of the Board of Directors consists of a fixed component, corresponding to an annual amount, payable 12 times per year.

The annual variable remuneration of executive Directors is of an occasional nature and, overall, may correspond to a percentage not exceeding five per cent of the net profit of the previous financial year, in accordance with the Company's Articles of Association.

The determination of this component falls within the competence of the Remuneration Committee, with the performance assessment of each executive Director following an internal structured process under the responsibility/leadership of the respective person in charge (i.e. under the responsibility of the person who chairs the team, in the case of members of the Executive Committee, and under the responsibility of the Chairman of the Board of Directors, in the case of the Chairman of the Executive Committee) and in which non-executive Directors that the person in charge considers relevant to involve also participate. The Talent Committee is also involved in this process, being responsible for monitoring the performance assessment system of the Board and the remuneration allocation process and for issuing opinions on the individual performance assessment proposals of the executive management. Finally, it falls to the Remuneration Committee to confirm, with regard to performance assessment, the respective achievement factors and to ensure the overall coherence of the process, setting the variable remuneration.

The annual variable remuneration is based on a target value applicable to each Director, which is paid under conditions of individual and Company performance that correspond to the expectations and previously established objectives. This target value is defined by weighing the general principles referred to above – market, specific functions, situation of the Company – with particular emphasis on comparable market situations in functions of equivalent relevance.

The weightings of actual performance against expectations and objectives, which determine the variation in relation to the target, are based on a set of quantitative and qualitative KPIs related to the performance of the Company (corresponding to the general business indicators, with a weighting of 65%) and to the performance of the Director in question (corresponding to specific objectives, with a weighting of 20%, and behavioural indicators, with a weighting of 15%).

The general business indicators and their respective relative weightings, which may be subject to an annual relative adjustment of a maximum of 5%, are as follows:

a) EBITDA, with a weighting of 35%;

b) Net profits, with a weighting of 10%;

c) Cash flow, with a weighting of 10%; and

d) Total Shareholder Return vs. Peers, with a weighting of 10%.

The specific objectives will always include ESG indicators, such as, for example, the result of the annual climate study at the Company, the reduction of CO2 emissions, certified timber and water, energy and timber consumption.

Furthermore, and within the behavioural indicators, particular relevance is given to the alignment of each executive Director with the existing leadership model and the long-term interests of the Company.

The performance criteria referred to above are applied mathematically in their quantitative part – using as a reference the values of the business plans approved by the Board of Directors, with these commitments being compared, at the end of each period, against the results actually achieved – and through qualitative assessments with regard to the qualitative part.

In addition to the statutory limit on the participation of the Board of Directors in the profits of the financial year, there are also mechanisms in the Company for limiting variable remuneration: (i) the variable component is eliminated in the event that the results show a deterioration considered relevant in the Company's performance in the last assessed financial year or when such deterioration is expected in the current financial year; and (ii) the amount of attributable annual variable remuneration has a defined cap, corresponding to 1.8 times the target, in order to prevent good performance at any given moment, with immediate remuneration advantages for the Board of Directors, from being achieved at the expense of good future performance.

The determination of annual variable remuneration may take into account reasonable adjustments relating to exogenous factors and unforeseen economic decisions, as previously defined by the Remuneration Committee.

The nature of the indicators, their respective weighting in determining actual variable remuneration and the limits on the application of variable remuneration create a remuneration model based on the recognition of merit by reference to the Company's actual performance and the discouragement of excessive risk-taking, whilst at the same time contributing to the implementation of the strategy defined by The Navigator Company and ensuring the alignment of the interests of executive members of the management body with the long-term interests of the Company.

The remuneration of members of the Audit Board consists solely of a fixed component, comprising a fixed annual amount, payable 12 times per year, with the remuneration of the Chairman of the Audit Board being higher than that of the other members of the Audit Board, taking into account the special functions performed. No agreements have been established or have ever been established by this Committee regarding payments by The Navigator Company relating to the dismissal or cessation of functions of members of the Audit Board.

The remuneration of members of the General Meeting Bureau consists solely of a fixed component, comprising a predetermined amount per meeting that actually takes place, with a lower amount applicable to the second and subsequent meetings held during

the same year. The remuneration of the person chairing the General Meeting Bureau will be higher than that of the person acting as secretary, taking into account the greater responsibility of the functions performed.

Although there is no independent remuneration mechanism in the Company with the specific objective of discouraging excessive risk-taking, Navigator does not include in the performance objectives of Directors any specific objectives that promote excessive risk, nor has it established any mechanism allowing advance payments of future remuneration. Risk is an inherent characteristic of any management act and, as such, inevitable and permanently subject to consideration in any decision of the Board of Directors. Its qualitative or quantitative assessment as good or bad cannot be made in isolation, but only in terms of its result in the performance of the Company over time. This assessment therefore aligns with long-term interests and accordingly benefits from the incentives for general long-term alignment and sustainability referred to above.

71. Reference, if applicable, to the existence of a variable remuneration component and information on any impact on this from performance assessments.

The existence of a variable component in the remuneration of executive directors and information on the possible impact of performance appraisals on this component are described above, in point 70, and in the Remuneration Policy in Annex 2, to which reference is made.

The remuneration of the members of the Audit Board does not include any variable component.

72. Deferred payment of the variable remuneration component, with reference to the deferral period.

The Company does not defer payment of the variable component of remuneration.

73. Criteria applied in allocating variable remuneration in shares and on the continued holding by executive directors of these shares, on any contracts concluded with regard to these shares, specifically hedging or transferring risk, the respective limits and the respective proportion represented of total annual remuneration.

The Company's variable remuneration does not include any share component.

74. Criteria applied on the allocating of variable remuneration in options and an indication of the deferral period and value.

The Company's variable remuneration does not include any options.

75. Main parameters and grounds for any annual bonus system and any other non-cash benefits.

The criteria used to set annual bonuses are those relating to variable remuneration, as described in point 2.2.2 of chapter 2 of the Remuneration Policy, and in points 25 and 70 above.

In addition to the variable component that may be attributed to members of the executive management bodies, no other non-pecuniary benefits are attributed to members of the management and supervisory bodies, without prejudice to the means made available to them for the performance of their duties, life insurance, health insurance and personal accident insurance in line with market practices.

76. Main features of complementary or early retirement schemes for directors, and the date of approval by the General Meeting for each individual.

There are currently no supplementary pension or early retirement schemes for Directors in the Company.

The Insurance and Pension Funds Supervisory Authority (ASF) approved, in 2022, with retroactive effect from 2 December 2021, an amendment to the Constitutive Contract of the Pension Fund, under the terms of which the Navigator Company Pension Plan was amended, with Directors no longer being entitled to a retirement supplement under the Plan.

However, under the terms of the Navigator Company Pension Plan Regulations (formerly the Portucel S.A. Pension Plan) in force until the effective date of the amendment to the Constitutive Contract, Directors of the Company who received remuneration as such, and who had completed at least one full term of office under the Articles of Association, were entitled, upon retirement or in the event of disability occurring during the term of office, to a monthly supplement to their old-age or disability retirement pension, respectively.

If disability occurred after the end of the term of office, the said members of the Board of Directors would only be entitled to the disability pension supplement if they were awarded, by the Social Security body with which they were registered, the corresponding disability pension and if they requested it from the Company.

This supplement was defined in accordance with a formula that takes into account the gross monthly remuneration and the number of years of service, with a minimum of 10 years and a maximum of 30 years being considered.

Directors António José Pereira Redondo, João Paulo Cabete Gonçalves Lé and António Quirino Vaz Duarte Soares are participants in pension plans of Navigator Brands, S.A., a subsidiary of the Company, in their capacity as employees of that company, prior to having taken up management positions.

By virtue of the specific nature of the Navigator Group's pension plan, the General Meeting has not, to date, been involved in the approval of the principal characteristics relating to the specific rules applicable to the retirement of Directors.

It should be noted in this regard that the Company was a public company until 1991, with its activity and mode of operation regulated by the special law applicable to this type of company, with the specific rules applied to the retirement of members of the Board of Directors having been approved during this period.

However, it is important to note that the supplementary retirement pension plans in force at the Company are described in Note 7 of the annexes to the consolidated accounts for the financial year, which form part of the Annual Report subject to approval by the General Meeting.

IV. Disclosure of Remuneration

77. Indication of the annual amount of remuneration earned, in aggregate and individual form, by the members of the management bodies of the company, from the company, including fixed and variable remuneration and, in relation to this, mention of the different components that gave rise to it.

The amount of remuneration received in the year 2025 is set out below, it being noted that the variable remuneration was paid in 2025 but relates to performance in 2024, by the members of the management body of the Company, received from Navigator, with a distinction between fixed and variable remuneration and the respective percentages, but without distinguishing the different components that gave rise to the variable remuneration, as the variable component is defined as a whole, weighing the elements explained in the Remuneration Policy, without identification of components.

Board of Directors	Fixed Remuneration		Variable Remuneration	
	Amount (in euros)	Relative percentage	Amount (in euros)	Relative percentage
António José Pereira Redondo	701 766	42.68%	942 310	57.32%
José Fernando Morais Carreira de Araújo	335 175	33.71%	659 190	66.29%
Nuno Miguel Moreira de Araújo Santos	335 175	32.69%	690 259	67.31%
João Paulo Cabete Gonçalves Lé	335 175	33.47%	666 095	66.53%
Dorival Martins de Almeida	335 175	31.23%	737 993	68.77%
António Quirino Vaz Duarte Soares	335 175	31.72%	721 513	68.28%
Ana Teresa Cunha de Pinho Tavares Lehmann	77 000	100%	-	0.00%
Maria Teresa Aliu Presas	77 000	100%	-	0.00%
Mariana Rita Antunes Marques dos Santos	105 000	100%	-	0.00%
Sandra Maria Soares Santos	19 250	100%	-	0.00%

The table above shows the annual amount corresponding to the period in which the members of the Board of Directors held office.

The tables below show, for the purposes of Article 26-G(2)(c) of the Securities Code, the annual variations over the last five financial years in the remuneration paid individually by the Company to the members of the Board of Directors, as well as the average remuneration of the Company's full-time equivalent Employees, and the Company's performance indicators:

(Amounts in euros)

Board of Directors		2021	2022	2023	2024	2025
António José Pereira Redondo	Fixed Remuneration (€)	668 349	651 780	707 196	701 766	701 766
	Variable Remuneration (€)	839 967	777 486	982 603	735 572	942 310
	Total Remuneration (€)	1 508 316	1 429 266	1 689 799	1 437 338	1 644 076
	Variation in %	79.2%	-5.2%	18.2%	-14.9%	14.4%
José Fernando Morais Carreira de Araújo	Fixed Remuneration (€)	319 213	319 213	329 854	335 175	335 175
	Variable Remuneration (€)	599 173	623 780	717 151	488 513	659 190
	Total Remuneration (€)	918 386	942 993	1 047 005	823 688	994 365
	Variation in %	87.9%	2.7%	11.0%	-21.3%	20.7%
Nuno Miguel Moreira de Araújo Santos	Fixed Remuneration (€)	319 199	319 199	329 850	335 175	335 175
	Variable Remuneration (€)	474 022	612 855	740 185	535 538	690 259
	Total Remuneration (€)	793 221	932 054	1 070 035	870 713	1 025 434
	Variation in %	79.4%	17.5%	14.8%	-18.6%	17.8%
João Paulo Cabete Gonçalves Lé	Fixed Remuneration (€)	319 214	319 214	329 855	335 175	335 175
	Variable Remuneration (€)	524 141	602 857	735 822	507 561	666 095
	Total Remuneration (€)	843 355	922 071	1 065 677	842 736	1 001 270
	Variation in %	155.2%	9.3%	15.6%	-20.9%	18.8%
Dorival Martins de Almeida	Fixed Remuneration (€)	-	-	230 946	335 175	335 175
	Variable Remuneration (€)	-	-	-	365 011	737 993
	Total Remuneration (€)	-	-	230 946	700 186	1 073 168
	Variation in %	-	-	100.0%	203.2%	53.3%
António Quirino Vaz Duarte Soares	Fixed Remuneration (€)	-	-	139 656	335 175	335 175
	Variable Remuneration (€)	-	-	-	231 101	721 513
	Total Remuneration (€)	-	-	139 656	566 276	1 056 688
	Variation in %	-	-	100.0%	305.5%	86.6%
Ana Teresa Cunha de Pinho Tavares Lehmann	Fixed Remuneration (€)	-	-	47 707	77 000	77 000
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	-	-	47 707	77 000	77 000
	Variation in %	-	-	100.0%	100.0%	0.0%
Maria Teresa Aliu Presas	Fixed Remuneration (€)	77 000	77 000	77 000	77 000	77 000
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	77 000	77 000	77 000	77 000	77 000
	Variation in %	2.0%	0.0%	0.0%	0.0%	0.0%
Mariana Rita Antunes Marques dos Santos	Fixed Remuneration (€)	105 000	105 000	105 000	105 000	105 000
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	105 000	105 000	105 000	105 000	105 000
	Variation in %	2.0%	0.0%	0.0%	0.0%	0.0%

Board of Directors		2021	2022	2023	2024	2025
Sandra Maria Soares Santos	Fixed Remuneration (€)	77 000	77 000	77 000	77 000	19 250
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	77 000	77 000	77 000	77 000	19 250
	Variation in %	2.0%	0.0%	0.0%	0.0%	-75.0%
João Paulo Araújo Oliveira	Fixed Remuneration (€)	319 806	319 199	190 193	0	0
	Variable Remuneration (€)	582 448	567 308	718 958	290 622	0
	Total Remuneration (€)	902 254	886 507	909 151	290 622	0
	Variation in %	107.5%	-1.7%	2.6%	-68.0%	-100.0%
Adriano Augusto da Silva Silveira	Fixed Remuneration (€)	319 214	319 214	238 006	180 000	180 000
	Variable Remuneration (€)	628 891	625 240	792 842	231 101	0
	Total Remuneration (€)	948 105	944 454	1 030 848	411 101	180 000
	Variation in %	120.4%	-0.4%	9.1%	-60.1%	-56.2%
Manuel Soares Ferreira Regalado	Fixed Remuneration (€)	77 000	77 000	32 083	0	0
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	77 000	77 000	32 083	0	0
	Variation in %	1.9%	0.0%	-58.3%	0.0%	0.0%
Vítor Manuel Galvão Rocha Novais Gonçalves	Fixed Remuneration (€)	77 000	98 000	40 833	0	0
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	77 000	98 000	40 833	0	0
	Variation in %	-19.9%	27.3%	-58.3%	0.0%	0.0%
Luís Alberto Caldeira Deslandes	Fixed Remuneration (€)	-	77 000	-	0	0
	Variable Remuneration (€)	-	-	-	0	0
	Total Remuneration (€)	-	77 000	-	0	0
	Variation in %	-	100.0%	-100.0%	0.0%	0.0%

(Amount in euros)

Audit Board		2021	2022	2023	2024	2025
Maria da Luz Gonçalves de Andrade Campos	Fixed Remuneration (€)	-	-	-	15 056	26 600
	Variation in %	0.00%	0.00%	0.00%	100.0%	76.7%
José Manuel Oliveira Vitorino	Fixed Remuneration (€)	21 994	21 994	35 147	35 147	25 240
	Variation in %	0.00%	0.00%	59.80%	0.0%	-28.2%
Jorge Manuel Araújo de Beja Neves	Fixed Remuneration (€)	-	-	-	-	12 740
	Variation in %	-	-	-	-	0.0%
Gonçalo Nuno Palha Gaio Picão Caldeira	Fixed Remuneration (€)	16 002	16 002	25 593	25 593	9 100
	Variation in %	0.00%	0.00%	59.94%	0.0%	-64.4%
Maria da Graça Torres Ferreira da Cunha Gonçalves	Fixed Remuneration (€)	16 002	16 002	25 593	-	0
	Variation in %	0.00%	0.00%	59.94%	-100.0%	0.0%

78. Amounts paid on any basis by other controlled, controlling or group companies or companies under common control.

It should be clarified that the amounts referred to in this paragraph relate only to companies not controlled by Navigator. Also included are amounts to which Navigator and its Corporate Bodies are unrelated, as they concern its Shareholders, Shareholders of Shareholders and other companies controlled by Shareholders, provided that controlling relationships exist.

In 2025, the following Directors received remuneration from other companies in a controlling relationship or subject to common control: Ricardo Miguel dos Santos Pacheco Pires (€1,514,859.00), Hugo Alexandre Lopes Pinto (€635,260.25), Maria Isabel da Silva Marques Abranches Viegas (€351,279.14) and Vítor Paulo Paranhos Pereira (€945,655.00). It is clarified that the remaining members of the Board of Directors did not receive remuneration from other companies in a group relationship with Navigator, based on the definition of group within the meaning of paragraph g) of paragraph 1 of Article 2 of Decree-Law No. 158/2009 of 13 July, in accordance with the provisions of paragraph d) of paragraph 2 of Article 26-G of the Securities Code.

79. Remuneration paid in the form of profit sharing and/or payment of bonuses, and the grounds on which these bonuses and/or profit sharing were granted.

The amount of remuneration paid by the Company in the form of profit-sharing and/or bonus payments corresponds to the variable remuneration set out in point 77 of this Report, such amounts having been determined on the basis of the specific application by the Remuneration Committee of the criteria described in chapter 2 of the Remuneration Policy.

80. Compensation paid or due to former executive directors for their dismissal during the year.

No indemnities, payments, charges or benefits were paid during the financial year, nor are any owed by Navigator to any former members of the Corporate Bodies and Internal Committees, relating to the cessation of functions, on any grounds, in the financial year in question.

81. Indication of the annual remuneration earned, on an aggregate and individual basis, by the members of the Company's supervisory bodies, for the purposes of Law 28/2009 of 19 June.

Audit Board	Fixed Remuneration		Variable Remuneration	
	Amount (in euros)	Relative Percentage	Amount (in euros)	Relative Percentage
Maria da Luz Gonçalves de Andrade Campos	26,600	100%	0	0%
José Manuel Oliveira Vitorino	25,240	100%	0	0%
Jorge Manuel Araújo de Beja Neves	12,740	100%	0	0%
Gonçalo Nuno Palha Gaio Picão Caldeira	9,100	100%	0	0%

82. Indication of remuneration earned in the reporting period by the Chairman of the General Meeting.

The Chairman of the General Meeting Board receives exclusively fixed remuneration, taking into account the number of General Meeting sessions held in each year.

During 2025, the Chairman of the General Meeting Bureau received fixed remuneration in the amount of €5,000 (five thousand euros).

V. Agreements with implications for remuneration

83. Contractual limits on severance pay for directors, and the respective relationship with the variable remuneration component.

The Company has no contracts with Directors that limit or otherwise alter the default legal regime for cases of cessation of office, with or without just cause, with the Remuneration Policy approved by the Company's Remuneration Committee providing that, in the event of cessation of office of Directors, the default legal regime in this matter shall apply.

Accordingly, having regard to the absence of individual contracts with Directors in this regard and to the provisions of the aforementioned Remuneration Policy, in the event of removal from office that does not arise from a serious breach of the Director's duties or from incapacity to perform their functions in the normal manner, the Company will be obliged to pay compensation in accordance with the general rules of law, without such compensation being capable of exceeding the amount of remuneration that the Director would presumably have received until the end of the period for which they were elected.

The cessation of office prior to the expiry of the mandate shall not therefore give rise, directly or indirectly, to the payment to the Director of any amounts beyond those provided for by law.

84. Reference to the existence and description, with an indication of the amounts involved, of agreements between the company and members of the board of directors and senior managers, within the meaning of Article 29-R(3) of the Securities Code, which provide for compensation in the event of resignation, unfair dismissal or termination of the employment relationship following a change of control of the company (Article 29-H(1)(k) of the CVM).

There are also no agreements between the Company and members of the board of directors and senior managers that provide for compensation in the event of resignation, unfair dismissal or termination of the employment relationship following a change of control of the Company.

VI. Stocks or stock option plans

85. Identification of plan and beneficiaries.

Not applicable, as there are no remuneration payments through share award plans or stock option plans.

86. Description of plan (terms of allocation, non-transfer of share clauses, criteria on the price of shares and the price of exercising options, the period during which the options may be exercised, the characteristics of the shares to be distributed, the existence of incentives to purchase shares and/or exercise options).

Not applicable.

87. Stock-option rights for which the company's workers and Employees are the beneficiaries.

Not applicable.

88. Control mechanisms in an employee ownership scheme insofar as voting rights are not directly exercised by Employees (article 29-A (1) (e) of the CVM).

There is no employee ownership scheme in Navigator.

E. RELATED PARTY TRANSACTIONS AND CONFLICTS OF INTEREST

I. Control mechanisms and procedures

89. Procedures implemented by the Company for controlling related party transactions (reference is made for this purpose to the concept deriving from IAS 24).

The Company has in place Regulations on Conflicts of Interest and Related Party Transactions, through which rules have been established governing conflicts of interest and related party transactions to which the Company is a party, as a complement to the internal mechanisms that the Company has in place for the purposes of compliance with International Accounting Standard IAS 24 (Related Party Disclosures), and which are applicable without prejudice to the obligations of the Company and its officers in respect of Inside Information, the legal regime governing transactions between the Company and Directors, and the internal regulations on Whistleblowing and other applicable legislation in this area.

These Regulations were approved with a favourable and binding opinion of the Supervisory Board, incorporating the applicable legal and regulatory framework in force on this matter, namely Law No. 50/2020 of 25 August and Law No. 99-A/2021 of 31 December.

The aforementioned regulations are available for consultation on the Company's website (https://thenavigatorcompany.com/en/investors/governance/).

Pursuant to the Regulations on Conflicts of Interest and Related Party Transactions, transactions between the Company and related parties - as qualified by the international accounting standards adopted pursuant to Regulation (EC) No. 1606/2002 of the European Parliament and of the Council of 19 July, namely International Accounting Standard IAS 24 (Related Party Disclosures) - are subject to the following approval procedures:

The following transactions are approved by the Executive Committee:

a) Loans made to the Company by companies that are its Shareholders, with a value equal to or less than one hundred million euros;

b) Transactions within the scope of the group taxation regime, with a value equal to or less than one hundred million euros;

c) Transactions carried out with controlled companies that consolidate accounts with the Company, with an individual or cumulative annual value equal to or less than two per cent of the turnover of the controlled company, determined in accordance with the most recently approved annual accounts;

d) Loans to controlled companies that consolidate accounts with the Company and, likewise, subscriptions to their debt instruments, (i) with a term of less than six months, (ii) with an individual or cumulative annual value of less than one fifth of the turnover of the respective controlled company, determined in accordance with the most recently approved annual accounts, and not exceeding one hundred million euros, and (iii) provided that the controlled company maintains credit facilities for the repayment of the transaction; and

e) Any other transactions whose individual or cumulative annual value is equal to or less than one million euros.

Transactions that (i) do not fall within the scope of the preceding paragraphs, or (ii) fall within the scope of those paragraphs but are not carried out in the ordinary course of the Company's business, are approved by resolution of the Board of Directors, preceded by a favourable opinion of the Supervisory Board.

In accordance with the aforementioned Regulations, only transactions carried out on market terms and where there is a justified interest of the Company are permitted.

With regard to the procedures for notification, verification and formalisation of related party transactions, the Regulations provide that:

a) The Board of Directors is informed on a semi-annual basis of resolutions relating to transactions in which it has not participated;

b) The Supervisory Board is informed of transactions carried out by the Company for the purposes of verifying compliance of such transactions with the regime described above and with applicable legislation and regulations, with related parties being precluded from participating in the relevant verification;

c) It is further incumbent upon the Company's officers who are involved in the formalisation of related party transactions to ensure that such transactions are submitted in advance to the resolutions required by the Regulations and by applicable legislation and regulations; and

d) The formalisation and implementation of resolutions on related party transactions must be subject to special monitoring by the Executive Committee.

The Company will disclose transactions that are required to be disclosed pursuant to applicable legislation and regulations, in particular where they have not satisfied one of the legally prescribed requirements and depending on the value involved, within the terms and timeframe set out in applicable legislation and regulations.

The Regulations shall not apply to transactions treated as exempt under applicable legislation and regulations.

As part of its ongoing commitment to ethics and integrity, it is incumbent upon Navigator to adopt measures that ensure impartiality in decision-making processes, preventing instances of potential conflicts of interest involving the Company or its Employees.

This commitment is reflected in the manner in which the Company manages conflicts of interest and is implemented through:

a) The implementation of clear policies and procedures defining what constitutes a conflict of interest and establishing guidelines for its identification, disclosure and resolution;

b) The promotion of an organisational culture that values transparency, honesty and integrity in all commercial interactions and decisions taken;

c) Regular training for all Employees on how to recognise, report and resolve conflicts of interest situations in an appropriate manner; and

d) The maintenance of communication channels through which Employees and interested parties may report concerns relating to potential conflicts of interest.

With regard to the procedures applicable in respect of conflicts of interest, the Regulations on Conflicts of Interest and Related Party Transactions provide that a conflict of interest situation arises whenever a manager finds themselves in a position that, viewed objectively, is liable to compromise their independence and to cause their judgement to be influenced by interests other than those of the Company, whether such interests are of a patrimonial nature or otherwise, and whether they are their own or those of third parties. For the purposes of their adequate prevention, identification and resolution, the manager must:

- Communicate the existence of a conflict of interest, even if potential, to their hierarchical superior or, in the case of a member of a collegiate body, to the body in question, under the terms of the respective operating regulations; and

- Refrain from interfering or participating in the event of a conflict of interest and, in the case of a decision-making process, record this impediment in the minutes or other written document documenting the decision, without prejudice to the duty to provide the information and clarifications requested by the body in question and its members.

The Company also has internal control mechanisms with regard to the identification of potential conflict of interest situations, including a procedure for the reporting and verification of such situations. In this context, it maps those Employees who, by virtue of their functions, find themselves in situations liable to give rise to conflicts of interest, in order subsequently to identify third parties who may be related parties in transactions with Navigator, periodically updating this analysis.

It should further be noted that all operating regulations of the Corporate Bodies and Internal Committees include provisions on conflicts of interest, in accordance with the rules described above.

90. Indication of transactions subject to control in the reporting period.

In 2025, there were no transactions subject to oversight, given that, by application of the criteria referred to in point 91 below, none of the Company's transactions with Shareholders holding qualifying shareholdings or with entities that are in any relationship with the Company, within the meaning of Article 20 of the Securities Code, were subject to a prior opinion of the Supervisory

Board. It should further be noted that there were no transactions between the Company and holders of qualifying shareholdings outside of normal market conditions.

91. Description of the procedures and criteria applicable to intervention by the supervisory body for the purposes of prior evaluation of transactions to be carried out between the Company and qualifying shareholders or related entities, under article 20 of the Securities Code.

The procedures and criteria applicable to the intervention of the supervisory body for the purposes of the prior assessment of transactions to be entered into between the Company and holders of qualifying shareholdings or entities that are in any relationship with them, within the meaning of Article 20 of the Securities Code, are described in point 89.

II. Details of transactions

92. Indication of the place in the financial reports and account where information is available on related party transactions, in accordance with IAS 24, or, alternatively, reproduction of this information.

The information available on related party transactions is included in the Company's Annual Report, in the Notes to the Consolidated Financial Statements, more specifically in Note 11.3.

Part II
Corporate Government Assessment

1. IDENTIFICATION OF THE CORPORATE GOVERNANCE CODE ADOPTED

Navigator has adopted the Corporate Governance Code of the Portuguese Institute of Corporate Governance (IPCG) of 2018, as revised in 2023, also complying with the provisions of CMVM Regulation No. 4/2013.

The adopted Code is published by the IPCG and may be accessed on its website at https://cgov.pt/images/ficheiros/2023/cgs-revisao-de-2023-ebook.pdf.

2. ANALYSIS OF COMPLIANCE WITH THE CORPORATE GOVERNANCE CODE ADOPTED

Navigator has adopted the majority of the Recommendations of the IPCG Corporate Governance Code.

The following table sets out the Principles and Recommendations of that Code, indicating the Recommendations that have been adopted, those that are not applicable and those that have not been adopted. In respect of the Recommendations that have been adopted, a cross-reference is made to the points of this Report where the matter is addressed in detail. In respect of the Recommendations that have not been adopted, the justification for non-adoption and any equivalent explanatory mechanism adopted are set out below the table.

	Compliance	Comments
GENERAL PRINCIPLES		
A. Corporate governance promotes and fosters the pursuit of the respective long-term interests, performance and sustained development, and is structured in order to allow the interests of shareholders and other investors, staff, clients, creditors, suppliers and other stakeholders to be weighed, contributing to the strengthening of confidence in the quality, transparency and ethical standards of administration and supervision, as well as to the sustainable development of the community the companies form part of and to the development of the capital market.		
B. The Code is voluntary, and compliance is based on the comply or explain principle, applicable to all Recommendations.		
Chapter I – Company's relationship with Shareholders, Interested Parties and the Community at Large		
Principles		
I.A. In their organisation, operation and in the definition of their strategy, companies shall contribute to the pursuit of the Sustainable Development Goals defined within the framework of the United Nations Organisation, in terms that are appropriate to the nature of their activity and their size. In their organisation, operation and in the definition of their strategy, companies shall contribute to the pursuit of the Sustainable Development Goals defined within the framework of the United Nations Organisation, in terms that are appropriate to the nature of their activity and their size.		
I.B. The company periodically identifies, measures and seeks to prevent negative effects related to the environmental and social impact of the operation of its activity, in terms that are appropriate to the nature and size of the company.		
I.C. In its decision-making processes, the management body considers the interests of shareholders and other investors, employees, suppliers and other stakeholders in the activity of the company.		
Recommendations		
I.1. The company specifies how its strategy seeks to ensure fulfilment of its long-term objectives and what its main contributions are to the community at large.	Adopted	Part I, no. 21 Annual Report, Chp. 3.4, 2030 Agenda and Roadmap
I.2. The company identifies the main policies and measures adopted with regard to the fulfilment of its environmental and social objectives.	Adopted	Part I, nos. 21, 29, 49 and 53 Annual Report Chp. 3.4.2, Our Agenda Chapter 5, Non-Financial Statement, in particular the policies identified in Chapters 5.2.2.2.1; 5.2.3.2.1; 5.3.4.2.1; 5.2.5.2.1; 5.2.6.1; 5.3.1.2.1; 5.3.2.2.1; 5.3.3.2.1 and 5.4.1.2.1

	Compliance	Comments
Chapter II - COMPOSITION AND FUNCTIONING OF THE CORPORATE BODIES		
II.1. Information		
Principle II.1.A. Companies and, in particular, their directors treat shareholders and other investors in an equitable manner, namely by ensuring mechanisms and procedures for the adequate treatment and disclosure of information.		
Recommendation		
II.1.1. The company establishes mechanisms to adequately and rigorously ensure the timely circulation or disclosure of the information required to its bodies, the company secretary, shareholders, investors, financial analysts, other stakeholders and the market at large.	Adopted	Part I, nos. 21, 22, 38 and 56 to 65 Annual Report, Chp. 3.4.5 and 5
II.2. Diversity in the Composition and Functioning of the Corporate Bodies		
Principles II.2.A. Companies have adequate and transparent decision-making structures, ensuring maximum efficiency in the functioning of their bodies and committees. II.2.B. Companies ensure diversity in the composition of their management and supervisory bodies and the adoption of individual merit criteria in the respective appointment processes, which shall be the exclusive responsibility of shareholders. II.2.C. Companies ensure that the performance of their bodies and committees is duly recorded, namely in minutes of meetings, which allow for knowing not only the sense of the decisions taken but also their grounds and the opinions expressed by their members.		
Recommendations		
II.2.1. Companies establish, previously and abstractly, criteria and requirements regarding the profile of the members of the corporate bodies that are adequate to the function to be performed, considering, notably, individual attributes (such as competence, independence, integrity, availability and experience), and diversity requirements (with particular attention to equality between men and women), that may contribute to the improvement of the performance of the body and of the balance in its composition.	Adopted	Part I no. 16
II.2.2. The management and supervisory bodies and their internal committees are governed by regulations – notably regarding the exercise of their powers, chairmanship, the frequency of meetings, operation and the duties framework of their members – fully disclosed on the website of the company, whereby minutes of the respective meetings shall be drawn up.	Adopted	Part I nos. 22, 27, 29, 34 and 38
II.2.3. The composition and number of meetings for each year of the management and supervisory bodies and of their internal committees are disclosed on the website of the company.	Adopted	Part I nos. 22, 27, 34 and 61
II.2.4. The companies adopt a whistle-blowing policy that specifies the main rules and procedures to be followed for each communication and an internal reporting channel that also includes access for non- employees, as set forth in the applicable law.	Adopted	Part I nos. 49, 50, 54 and 89
II.2.5. The companies have specialised committees for matters of corporate governance, remuneration, appointments of members of the corporate bodies and performance assessment, separately or cumulatively. If the Remuneration Committee provided for in Article 399 of the Portuguese Commercial Companies Code has been set up, the present Recommendation can be complied with by assigning to said committee, if not prohibited by law, powers in the above matters.	Adopted	Part I nos. 21, 27 and 29
II.3. Relations between Corporate bodies		
Principle II.3.A. The corporate bodies create the conditions for them to act in a harmonious and articulated manner, within the scope of their responsibilities, and with information that is adequate for carrying out their functions.		
Recommendations		
II.3.1. The Articles of Association or equivalent means adopted by the company set out the mechanisms to ensure that, within the limits of the applicable laws, the members of the management and supervisory bodies have permanent access to all necessary information to assess the performance, situation and development prospects of the company, including, specifically, the minutes of the meetings, the documentation supporting the decisions taken, the convening notices and the archive of the meetings of the executive management body, without prejudice to access to any other documents or persons who may be requested to provide clarification.	Adopted	Part I nos. 21, 22 and 38
II.3.2. Each body and committee of the company ensures, in a timely and adequate manner, the interorganic flow of information required for the exercise of the legal and statutory powers of each of the other bodies and committees.	Adopted	Part I nos. 21, 22, 27 and 38
II.4. Conflicts of interests		
Principle II.4.A. The existence of current or potential conflicts of interest between the members of bodies or committees and the company shall be prevented, ensuring that the conflicted member does not interfere in the decision-making process.		
Recommendations		

	Compliance	Comments
II.4.1. By internal regulation or an equivalent hereof, the members of the management and supervisory bodies and of the internal committees shall be obliged to inform the respective body or committee whenever there are any facts that may constitute or give rise to a conflict between their interests and the interest of the company.	Adopted	Part I no. 89
II.4.2. The company adopts procedures to ensure that the conflicted member does not interfere in the decision-making process, without prejudice to the duty to provide information and clarification requested by the body, committee or respective members.	Adopted	Part I no. 89
II.5. Related Party Transactions		
Principle II.5.A. Transactions with related parties shall be justified by the interest of the company and shall be carried out under market conditions, being subject to principles of transparency and adequate supervision.		
Recommendation		
II.5.1. The management body discloses, in the corporate governance report or by other publicly available means, the internal procedure for verification of transactions with related parties.	Adopted	Part I nos. 38 and 89 to 81
Chapter III – SHAREHOLDERS AND GENERAL MEETING		
Principles III.A. The adequate involvement of shareholders in corporate governance constitutes a positive factor for the efficient functioning of the company and the achievement of its corporate objective. III.B. The company promotes the personal participation of shareholders at general meetings as a space for reflection on the company and for shareholders to communicate with the bodies and committees of the company. III.C. The company implements adequate means for shareholders to attend and vote at the general meeting without being present in person, including the possibility of sending in advance questions, requests for clarification or information on the matters to be decided on and the respective proposals.		
Recommendations		
III.1. The company does not set an excessively large number of shares to be entitled to one vote and informs in the corporate governance report of its choice whenever each share does not carry one vote.	Adopted	Part I no. 12 and 13
III.2. The company that has issued special plural voting rights shares identifies, in its corporate governance report, the matters that, pursuant to the company's Articles of Association, are excluded from the scope of plural voting.	Not applicable	Not applicable
III.3. The company does not adopt mechanisms that hinder the passing of resolutions by its shareholders, specifically fixing a quorum for resolutions greater than that foreseen by law.	Adopted	Part I, no. 14
III.4. The company implements adequate means for shareholders to participate in the general meeting without being present in person, in proportion to its size.	Adopted	Part I, no. 12
III.5. The company also implements adequate means for the exercise of voting rights without being present in person, including by correspondence and electronically.	Adopted	Part I, no. 12
III.6. The Articles of Association of the company that provide for the restriction of the number of votes that may be held or exercised by one single shareholder, either individually or jointly with other shareholders, shall also foresee that, at least every five years, the general meeting shall resolve on the amendment or maintenance of such statutory provision – without quorum requirements greater than that provided for by law – and that in said resolution, all votes issued are to be counted, without applying said restriction.	Not applicable	Not applicable
III.7. The company does not adopt any measures that require payments or the assumption of costs by the company in the event of change of control or change in the composition of the management body and which are likely to damage the economic interest in the transfer of shares and the free assessment by shareholders of the performance of the Directors.	Adopted	Part I, nos. 4, 83 and 84
Chapter IV – MANAGEMENT		
IV.1. Management Bodies and Executive Directors		
Principle IV.1.A. The day-to-day management of the company shall be the responsibility of executive directors with the qualifications, skills, and experience appropriate for the position, pursuing the corporate goals and aiming to contribute to its sustainable development. IV.1.B. The determination of the number of executive directors shall take into account the size of the company, the complexity and geographical dispersion of its activity and the costs, bearing in mind the desirable flexibility in the running of the executive management.		
Recommendations		
IV.1.1. The management body ensures that the company acts in accordance with its object and does not delegate powers, notably with regard to: i) definition of the corporate strategy and main policies of the company; ii) organisation and coordination of the corporate structure; iii) matters that shall be considered strategic due to the amounts, risk and particular characteristics involved.	Adopted	Part I, nos. 21 and 22

	Compliance	Comments
IV.1.2. The management body approves, by means of regulations or through an equivalent mechanism, the performance regime for executive directors applicable to the exercise of executive functions by them in entities outside the group.	Adopted	Part I, no. 22
IV.2. Management Body and Non-Executive Directors		
Principles IV.2.A. For the full achievement of the corporate objective, the non-executive directors shall exercise, in an effective and judicious manner, a function of general supervision and of challenging the executive management, whereby such performance shall be complemented by committees in areas that are central to the governance of the company. IV.2.B. The number and qualifications of the non-executive directors shall be adequate to provide the company with a balanced and appropriate diversity of professional skills, knowledge and experience.		
Recommendations		
IV.2.1. Notwithstanding the legal duties of the chairman of the board of directors, if the latter is not independent, the independent directors – or, if there are not enough independent directors, the non- executive directors – shall appoint a coordinator among themselves to, in particular (i) act, whenever necessary, as interlocutor with the chairman of the board of directors and with the other directors, (ii) ensure that they have all the conditions and means required to carry out their duties, and (iii) coordinate their performance assessment by the administration body as provided for in Recommendation VI.1.1.; alternatively, the company may establish another equivalent mechanism to ensure such coordination.	Adopted	Part I no. 18
IV.2.2. The number of non-executive members of the management body shall be adequate to the size of the company and the complexity of the risks inherent to its activity, but sufficient to ensure the efficient performance of the tasks entrusted to them, whereby the formulation of this adequacy judgement shall be included in the corporate governance report.	Adopted	Part I, nos. 18, 31, 50, 51 and 54
IV.2.3. The number of non-executive directors is greater than the number of executive directors.	Adopted	Part I, no. 18
IV.2.4. The number of non-executive directors that meet the independence requirements is plural and is not less than one third of the total number of non-executive directors. For the purposes of the present Recommendation, a person is deemed independent when not associated to any specific interest group in the company, nor in any circumstances liable to affect his/her impartiality of analysis or decision, in particular in virtue of: i) Having carried out, continuously or intermittently, functions in any corporate body of the company for more than twelve years, with this period being counted regardless of whether or not it coincides with the end of the mandate; ii) Having been an employee of the company or of a company that is controlled by or in a group relationship with the company in the last three years; iii) Having, in the last three years, provided services or established a significant business relationship with the company or with a company that is controlled by or in a group relationship with the company, either directly or as a partner, director, manager or officer of a legal person; iv) Being the beneficiary of remuneration paid by the company or by a company that is controlled by or in a group relationship with the company, in addition to remuneration stemming from the performance of the functions of director; v) Living in a non-marital partnership or being a spouse, relative or kin in a direct line and up to and including the 3rd degree, in a collateral line, of directors of the company, of directors of a legal person owning a qualifying stake in the company or of natural persons owning, directly or indirectly, a qualifying stake; vi) Being a holder of a qualifying stake or representative of a shareholder that is holder of a qualifying stake.	Adopted	Part I, no. 18
IV.2.5. The provisions of paragraph (i) of the previous Recommendation do not prevent the qualification of a new Director as independent if, between the end of his/her functions in any corporate body and his/her new appointment, at least three years have elapsed (cooling-off period).	Adopted	Part I, no. 18
Chapter V – SUPERVISION		
Principles V.A. The supervisory body carries out permanent supervision activities of the administration of the company, including, also from a preventive perspective, the monitoring of the activity of the company and, in particular, the decisions of fundamental importance for the company and for the full achievement of its corporate object. V.B. The composition of the supervisory body provides the company with a balanced and adequate diversity of professional skills, knowledge and experience.		
Recommendations		
V.1. With due regard for the competences conferred to it by law, the supervisory body takes cognisance of the strategic guidelines and evaluates and renders an opinion on the risk policy, prior to its final approval by the administration body.	Adopted	Part I, nos. 38 and 50
V.2. The number of members of the supervisory body and of the financial matters committee should be adequate in relation to the size of the company and the complexity of the risks inherent to its activity, but sufficient to ensure the efficiency of the tasks entrusted to them, and this adequacy judgement should be included in the corporate governance report.	Adopted	Part I, nos. 18, 31, 50, 51 and 54

	Compliance	Comments
Chapter VI - PERFORMANCE ASSESSMENT, REMUNERATION AND APPOINTMENTS		
VI.1. Annual Performance Assessment		
Principle VI.1.A. The company promotes the assessment of performance of the executive body and its individual members as well as the overall performance of the management body and its specialised committees.		
Recommendation		
VI.1.1. The management body – or committee with relevant powers, composed of a majority of non-executive members – evaluates its performance on an annual basis, as well as the performance of the executive committee, of the executive directors and of the company committees, taking into account the compliance with the strategic plan of the company and of the budget, the risk management, its internal functioning and the contribution of each member to that end, and the relationship between the bodies and committees of the company.	Adopted	Part I, nos. 22, 24 and 25
VI.2. Remuneration		
Principles VI.2.A. The remuneration policy for members of the management and supervisory bodies shall allow the company to attract qualified professionals at a cost that is economically justified by their situation, provide for the alignment with the interests of the shareholders – taking into consideration the wealth effectively created by the company, the economic situation and the market situation – and shall constitute a factor for developing a culture of professionalism, sustainability, merit promotion and transparency in the company. V.2.B. Taking into consideration that the position of directors is, by nature, a remunerated position, directors shall receive a remuneration: i) that adequately rewards the responsibility undertaken, the availability and competence placed at the service of the company; ii) that ensures a performance aligned with the long-term interests of shareholders and promotes the sustainable performance of the company; and iii) that rewards performance.		
Recommendation		
VI.2.1. The company constitutes a remuneration committee, whose composition shall ensure its independence from the board of directors, whereby it may be the remuneration committee appointed pursuant to Article 399 of the Portuguese Commercial Companies Code.	Adopted	Part I nos. 24, 27, 66 and 67
VI.2.2. The remuneration of the members of the management and supervisory bodies and of the company committees is established by the remuneration committee or by the general meeting, upon proposal of such committee.	Adopted	Part I nos. 24, 27, 66 and 67
VI.2.3. The company discloses in the corporate governance report, or in the remuneration report, the termination of office of any member of a body or committee of the company, indicating the amounts of all costs related to the termination of office borne by the company, for any reason, during the financial year in question.	Adopted	Part I no. 80
VI.2.4. In order to provide information or clarification to shareholders, the president or another member of the remuneration committee shall be present at the annual general meeting and at any other general meeting at which the agenda includes a matter related to the remuneration of the members of bodies and committees of the company, or if such presence has been requested by shareholders.	Adopted	Part I no. 76
VI.2.5. Within the budget constraints of the company, the remuneration committee may freely decide to hire, on behalf of the company, consultancy services that are necessary or convenient for the performance of its duties.	Adopted	Part I no. 67
VI.2.6. The remuneration committee ensures that such services are provided independently.	Adopted	Part I no. 67
VI.2.7. The providers of said services are not hired by the company itself or by any company controlled by or in group relationship with the company, for the provision of any other services related to the competencies of the remuneration committee, without the express authorisation of the committee.	Adopted	Part I no. 67
VI.2.8. In view of the alignment of interests between the company and the executive directors, a part of their remuneration has a variable nature that reflects the sustained performance of the company and does not encourage excessive risk-taking.	Adopted	Part I nos. 70 and 71 Part III Annex II
VI.2.9. A significant part of the variable component is partially deferred over time, for a period of no less than three years, and is linked to the confirmation of the sustainability of performance, in terms defined in the remuneration policy of the company.	Not adopted	Explanation of not adopted Recommendations below
VI.2.10. When the variable remuneration includes options or other instruments directly or indirectly subject to share value, the start of the exercise period is deferred for a period of no less than three years.	Not applicable	Not applicable
VI.2.11. The remuneration of non-executive directors does not include any component whose value depends on the performance of the company or of its value.	Adopted	Part I no. 71
VI.3. Appointments		
Principle VI.3.A. Regardless of the method of appointment, the knowledge, experience, professional background, and availability of the members of the corporate bodies and of the senior management shall be adequate for the job to be performed.		
Recommendations		

	Compliance	Comments
VI.3.1. The company promotes, in the terms it deems adequate, but in a manner susceptible of demonstration, that the proposals for the appointment of members of the corporate bodies are accompanied by grounds regarding the suitability of each of the candidates for the function to be performed.	Adopted	Part I no. 16
VI.3.2. The committee for the appointment of members of corporate bodies includes a majority of independent directors.	Not adopted	Explanation of not adopted Recommendations below
VI.3.3. Unless it is not justified by the size of the company, the task of monitoring and supporting the appointments of senior managers shall be assigned to an appointment committee.	Adopted	Part I no. 29
VI.3.4. The committee for the appointment of senior management provides its terms of reference and promotes, to the extent of its powers, the adoption of transparent selection processes that include effective mechanisms for identifying potential candidates, and that for selection those are proposed who present the greatest merit, are best suited for the requirements of the position and promote, within the organisation, an adequate diversity including regarding gender equality.	Adopted	Part I nos. 16 and 29
Chapter VII – INTERNAL CONTROL		
Principle VII.A. Based on the medium and long-term strategy, the company shall establish a system of internal control, comprising the functions of risk management and control, compliance and internal audit, which allows for the anticipation and minimisation of the risks inherent to the activity developed.		
Recommendations		
VII.1. The management body discusses and approves the strategic plan and risk policy of the company, which includes setting limits in matters of risk-taking.	Adopted	Part I nos. 22, 24 and 50, 54
VII.2. The company has a specialised committee, or a committee composed of specialists in risk matters, which reports regularly to the management body.	Adopted	Part I nos. 27, 29 and 50
VII.3. The supervisory body is organised internally, implementing periodic control mechanisms and procedures, in order to ensure that the risks effectively incurred by the company are consistent with the objectives set by the administration body.	Adopted	Part I nos. 21, 29, 38, 50, 53 and 54
VII.4. The internal control system, comprising the risk management, compliance, and internal audit functions, is structured in terms that are adequate to the size of the company and the complexity of the risks inherent to its activity, whereby the supervisory body shall assess it and, within the ambit of its duty to monitor the effectiveness of this system, propose any adjustments that may be deemed necessary.	Adopted	Part I nos. 50 a 52, 54 and 55
VII.5. The company establishes procedures of supervision, periodic assessment and adjustment of the internal control system, including an annual assessment of the degree of internal compliance and performance of such system, as well as the prospects for changing the previously defined risk framework.	Adopted	Part I nos. 38 and 49 to 55
VII.6. Based on its risk policy, the company sets up a risk management function, identifying (i) the main risks to which it is subject in the operation of its business, (ii) the probability of their occurrence and respective impact, (iii) the instruments and measures to be adopted in order to mitigate such risks, and (iv) the monitoring procedures, aimed at following them up.	Adopted	Part I nos. 38 and 49 to 55
VII.7. The company establishes processes to collect and process data related to the environmental and social sustainability in order to alert the management body to risks that the company may be incurring and propose strategies for their mitigation.	Adopted	Part I nos. 21, 25, 29, 30, and 50 to 54
VII.8. The company reports on how climate change is considered within the organisation and how it takes into account the analysis of climate risk in the decision-making processes.	Adopted	Part I nos. 21, 29, 30, and 50 to 54 Annual Report Chapters 3.3; 5.2.1 and 5.2.2
VII.9. The company informs in the corporate governance report on the manner in which artificial intelligence mechanisms have been used as a decision-making tool by the corporate bodies.	Adopted	Part I no. 53
VII.10. The supervisory body pronounces on the work plans and resources allocated to the services of the internal control system, including the risk management, compliance, and internal audit functions, and may propose adjustments as deemed necessary.	Adopted	Part I nos. 38 to 50
VII.11. The supervisory body is the addressee of reports made by the internal control services, including the risk management, compliance, and internal audit functions, at least when matters related to accountability, identification or resolution of conflicts of interest and detection of potential irregularities are concerned.	Adopted	Part I nos. 45 to 50
Chapter VIII - INFORMATION AND STATUTORY AUDIT OF THE ACCOUNTS		
VIII.1. Information		
Principles VIII.1.A. The supervisory body, diligently and with independence, ensures that the management body observes its responsibilities in choosing policies and adopting appropriate accounting criteria and establishing adequate systems for financial and sustainability reporting, and for internal control, including		

	Compliance	Comments
risk management, compliance and internal audit. VIII.1.B. The supervisory body promotes a proper articulation between the work of the internal audit and that of the statutory audit of accounts.		
Recommendation		
VIII.1.1. The regulations of the supervisory body requires that the supervisory body monitors the suitability of the process of preparation and disclosure of information by the management body, including the appropriateness of accounting policies, estimates, judgements, relevant disclosures and their consistent application from financial year to financial year, in a duly documented and reported manner.	Adopted	Part I no. 38
VIII.2. Statutory Audit and Supervision		
Principle VIII.2.A. It is the responsibility of the supervisory body to establish and monitor formal, clear, and transparent procedures as to the relationship between the company and the statutory auditor and the supervision of compliance, by the statutory auditor, with the rules of independence imposed by law and by professional standards.		
Recommendations		
VIII.2.1. By means of regulation, the supervisory body defines, in accordance with the applicable legal regime, the supervisory procedures to ensure the independence of the statutory auditor.	Adopted	Part I nos. 37, 38 and 46
VIII.2.2. The supervisory body is the main interlocutor of the statutory auditor within the company and the first addressee of the respective reports, and is competent, namely, for proposing the respective remuneration and ensuring that adequate conditions for the provision of the services are in place within the company.	Adopted	Part I nos. 38 and 45
VIII.2.3. The supervisory body annually evaluates the work carried out by the statutory auditor, its independence and suitability for the exercise of its functions and shall propose to the competent body its dismissal or termination of the contract for the provision of its services whenever there is just cause to do so.	Adopted	Part I nos. 38 and 45

COMPLY OR EXPLAIN

Explanation of non-adoption of recommendations

VI.2.9. A significant part of the variable component is partially deferred over time, for a period of no less than three years, and is linked to the confirmation of the sustainability of performance, in terms defined in the remuneration policy of the company.

The explanation for the non-adoption of this recommendation is set out in the statement on the remuneration policy in force, which corresponds to Annex 2 to this Report, and reads as follows:

"Several writings sustain profusely the deferral of the payment of the variable part of remuneration to a later time, which will enable the establishment of a direct relation between remuneration and the impact of management on the Company over a longer period.

We accept this principle as theoretically sound, but the historical element, associated to the stability and the practice that has been followed successfully for years without the element of deferral, leads us to not adopt that option for the time being."

The Company has not therefore accepted this recommendation, without prejudice to ensuring the substance which justifies it to an even greater extent than would result from compliance with it.

It should also be noted that Navigator's consolidated results for the financial year have repeatedly and consistently been very positive, demonstrating the sustainability of performance which the Recommendation seeks to safeguard. It follows from this background that the possible partial deferral for a period of no less than three years of the variable component of remuneration would have no impact on the right to the variable component for Navigator's directors.

However, it should be clarified that Navigator is currently analysing the model for deferring payment of part of the variable remuneration with a view to its possible implementation.

VI.3.2. The committee for the appointment of members of corporate bodies includes a majority of independent directors.

The Company's Nominations and Evaluation Committee includes four non-executive directors, but only one is independent - Mariana Rita Antunes Marques dos Santos. In choosing the members of this Committee, preference was given to a diversity of profiles (age, gender, qualifications, experience and professional career), ensuring that all of them have full impartiality of analysis and decision, and demonstrated integrity of character.

The Company believes that this diversity of profiles, together with the fact that the Nominations and Evaluation Committee uses, whenever necessary, market studies and the analysis of comparable situations within the Group, is sufficient to guarantee that its analyses are in line with the best practices and strengthen independent and impartial decision-making.

ANNEX 1

1) DISCLOSURES REFERRED TO IN ARTICLE 447 OF THE COMPANIES' CODE (WITH REFERENCE TO 2024)

Securities issued by Company and held by company officers:

António José Pereira Redondo: 6000 shares

2) INFORMATION ON OWN SHARES (required by Articles 66 and 324 no. 2 of the Companies Code)

On 31 December 2024, Navigator did not hold any own shares.

ANNEX 2

REMUNERATION POLICY OF THE DIRECTORS AND THE AUDITORS OF THE NAVIGATOR COMPANY (2023 TO 2025)

The Remuneration Committee of The Navigator Company, S.A. (The Navigator Company) has analysed and reviewed the Remuneration Policy for its directors and auditors adopted at The Navigator Company's Annual General Meeting of 2021 to be in force from 2021 to 2024, in view of strengthening its alignment with sustainability and preserving Company's long-term interests in line with good market practices, having decided to replace the current Policy with a new Remuneration Policy to be in force from 2023 to 2025, in order to make its period of application coincide with the mandate of the governing bodies.

The remuneration policy is the exclusive responsibility of the Remuneration Committee, which has three members, all independent from the Board. According to the law, it must be approved by the General Meeting at least every four years and whenever a relevant change occurs.

In its work, namely in determining, reviewing and applying the Policy, the Remuneration Committee complies with applicable legislation and The Navigator Company's current policies and regulations, namely the regulation on Conflicts of Interest and Related Party Transactions, which sets out rules for preventing, identifying and resolving conflicts of interest between the Company and its managers.

1. General Principles

This Remuneration Policy is founded on the following general principles that guide the setting of the remuneration of the governing bodies:

(a) Duties performed.

The duties performed by each member of the governing bodies cover both the functions in a formal sense and the duties in the broader sense of the concrete level of responsibility of the position held, considering different criteria, such as the commitment and time dedicated, the nature, size, complexity, and skills required for the function, or the added value to the company that results from a specific intervention or institutional representation.

The fact that time is spent by the officer on duties performed in other controlled companies also cannot be taken out of the equation, due to the added responsibility this represents and to the existence of another source of income.

(b) The state of the Company’s affairs.

The size of the company and the inevitable complexity of the related management responsibilities are clearly relevant aspects of the economic situation, understood in the broadest sense. These aspects have implications for the need to suitably remunerate directors holding high managerial duties, considering the size and complexity of the business models.

(c) Market criteria.

It is essential to be able to attract, develop and retain the best professionals. Consequently, the Remuneration Policy must competitive and appealing in order to ensure the legitimate interests of individuals are aligned with The Navigator Company’s interests and the creation of sustainable value for shareholders.

Given its characteristics and size, the market criteria and practices to be taken into account are, in The Navigator Company 's case, both national and international. In order to keep up to date with these practices, The Navigator Company regularly uses market research and benchmarking.

In this context, the different components of the directors’ remunerations are calculated at least based on the remuneration of the directors of the Portuguese companies listed on the PSI Index, while also taking into account, at each moment, the remuneration conditions applied in other companies with characteristics similar to those of The Navigator Company.

The remuneration system in place at The Navigator Company, in particular this Policy, contributes to the implementation of the business strategy of The Navigator Company and, in the long term, to the alignment of the interests of members of the management body with those of

the Company and its sustainability, in particular for the reasons set out below.

Firstly, because the remuneration is intended to be fair and equitable in the light of the principles set out, and secondly, because it lays down the evaluation criteria (indicators defined by the Remuneration Committee), which are aligned with the Company's own strategic objectives. Such indicators help to align the performance of the members of its corporate bodies with the long-term interests and sustainability of the Company.

The alignment between this Policy and the remuneration scheme and employment conditions of The Navigator Company employees is assured, given that both remuneration systems are based on the same General Principles set out in this Remuneration Policy, in particular the market conditions in the reference markets for the duties performed. Furthermore, the annual variation of the compensation paid individually by the Company to the members of the Board of Directors, as well as the average compensation of the company's full-time equivalent Employees is analysed.

Accordingly, this Policy aligns The Navigator Company with market best practices on remuneration, and with the recommendations of the IPCG Governance Code.

2. Board of Directors

2.1. Non-Executive Directors

The remuneration of non-executive directors shall comprise only a fixed component of an annual amount, paid 12 times per year, which may vary according to the piling on of added responsibilities,

e.g. committee and specialised committee members, or a fixed amount per Board meeting attended.

The remuneration of non-executive members of the Board of Directors does not include components dependent on the performance of the Company or on its value.

2.2. Executive Directors

The remuneration of the Executive Directors consists of two components: fixed and variable.

2.2.1. Fixed Remuneration

The remuneration of the executive Directors consists of a fixed component, corresponding to an annual amount payable 12 times per year.

2.2.2. Annual Variable Remuneration

The annual variable remuneration of the executive directors is contingent, and may amount, globally, to a percentage that does not exceed five per cent of the previous year's net profit, in accordance with the Company's articles of association.

The Remuneration Committee decides on this component, and the performance of each executive director is assessed following an internal process lead by the respective person in charge (i.e. the responsibility of the person who manages the team in the case of the members of the Executive Board, and the responsibility of the Chairman of the Board of Directors in the case of the CEO) and with the participation of the non-executive directors that the person in charge deems pertinent to involve.

The Nomination and Assessment Committee is also involved in this process. It is responsible for monitoring the system for assessing management performance and distributing the remuneration and delivering its opinion on the proposals for individual performance assessment of the executive board.

Finally, the Remuneration Committee must confirm that the factors have been met for the performance evaluation and ensure the overall consistency of the process by setting the variable remuneration.

The annual variable remuneration is based on the target amount applied to each director and is paid according to the individual's performance and performance of the Company that meet the expectations, and the criteria set previously. The target amount is weighted by the aforementioned general principles - market, specific functions, state of the Company -, in particular comparable market circumstances in equivalent functions. Another important factor taken into account when setting the targets is The Navigator Company's option not to provide any stock or stock option plans.

Actual performance compared to the expectations and goals, which determine target variations is weighed against a set of quantitative and qualitative KPIs of the company's performance (which consist of general business indicators weighing 65%) and of the relevant director performance

(which consists of specific objectives weighing 20% and behavioural indicators that account for 15%).

Overall business indicators and their relative weights, which may be adjusted annually up to 5% in relative terms, are as follows:

- EBITDA, accounting for 35%
- Net results, accounting for 10%
- Cash flow, accounting for 10%, and
- Total Shareholder Return vs Peers, accounting for 10%.

The specific objectives always include ESG indicators, such as the findings of the annual Corporate environment survey, the reduction of CO2 emissions, the certified wood and the consumption of water, energy and wood.

On the other hand, within the behavioural indicator, the alignment of each executive director with the existing leadership model and the long-term interests of the Company is relevant.

The performance criteria mentioned in the previous paragraph are applied mathematically for their quantitative part - based on the values of the business plans approved by the Board of Directors, and at the end of each period these commitments are compared with the actual income - and using value assessments for the qualitative part.

In addition to the statutory limit on management's share of profits for the year, the Company also has mechanisms in place to limit variable compensation: (i) the variable remuneration is eliminated in the event of the results showing a significant deterioration in the company's performance in the last reporting period or when such deterioration may be expected in the period underway, and (ii) the amount of the annual variable remuneration attributable has a cap corresponding to 1.8 times the target, to prevent good performance at one moment, with immediate remuneration benefits for the Board, from being achieved to the detriment of good performance in the future.

The annual variable remuneration is subject to reasonable adjustments related to exogenous factors and unforeseen economic decisions, as decided in advance by the Remuneration Committee.

The nature of the indicators, their weight in determining actual variable remuneration and the limits on the application of variable remuneration create a remuneration model based on recognising merit against the actual performance of the Company and discouraging excessive risk-taking, whilst helping to implement the strategy defined by The Navigator Company and ensuring that the interests of the executive directors are aligned with the Company's long-term interests.

3. Other benefits

In addition to the variable component that may be paid to the members of the management bodies, no other non-cash benefits are paid to directors and auditors, without prejudice to the means made available to them for the performance of their duties, a life insurance, a personal health insurance, and an accident insurance policy in line with market practices.

4. Other Considerations

There are no agreements, and no such provisions have been defined by this Committee, on payments by The Navigator Company relating to dismissal or termination of Directors' duties. This fact is the natural result of the particular situations existing in the Company, and not a position of principle taken by this Committee against the existence of agreements of this nature. Only the supplementary legal rule in this matter applies here, as established in the Companies Code, which governs the payment to the Directors of any amounts before the end of the mandate.

Similarly, there are no complementary or early retirement arrangements for directors currently in place in the company.

With regard to the obligation to return variable remuneration that has been paid, and without prejudice to the applicable legal provisions, if, by final court decision, The Navigator Company or the members of the Executive Board of The Navigator Company are found liable for unlawful and wilful acts of misconduct resulting in the need to restate its financial statements or to record reductions in the value of assets unfavourable to The Navigator Company, the Remuneration Committee may, at its discretion and by means of a resolution, demand from the executive directors the refund of the variable remuneration in respect of the period when such depreciation of the assets occurred or another period deemed relevant, in order to compensate The Navigator Company for the damage caused.

5. Audit Board

The remuneration of the members of the Audit Board shall consist only of a fixed component, i.e. a fixed annual

amount, payable 12 times a year; the remuneration of the Chairman of the Audit Board is higher than that of the other board members, taking into account the special functions performed by him/her.

There are no agreements, and no such provisions have been defined by this Committee, on payments by The Navigator Company relating to dismissal or termination of duties by the Members of the Audit Board.

6. General Meeting

The remuneration of the officers of the General Meeting shall consist of a fixed amount only (as decided) for each meeting held, whereas the remuneration of the second and subsequent meetings held in the same year shall be lower than that of the first general meeting. The remuneration of the Chairman of the General Meeting shall be higher than that of the Secretary, taking into account the greater responsibility of the duties performed.

Lisbon, 24 April 2023

The Remuneration Committee

ANNEX 3

CODE OF ETHICS AND CONDUCT

I. General Objectives and Values

1. The Code of Ethics and Conduct as the basis of the culture of The Navigator Group

The pursuit of the objectives, respect for the values and compliance with the rules of conduct set out in this Code of Ethics and Conduct constitute the ethical culture of The Navigator Company, S.A. (hereinafter "Navigator").

The Code of Ethics and Conduct is to be viewed as setting standards of conduct interpreted as a benchmark for behaviour, which Navigator and all those who work for it should follow and respect.

2. Fundamental Mission and Objectives

The Navigator Group aspires to extend the leadership earned in the printing and writing paper business to other businesses, thereby asserting Portugal in the world, as a global company, renown for developing, in an innovative and sustainable manner, the forest and providing products and services which contribute to the prosperity of individuals.

The fundamental aims pursued by Navigator are based on the sustained creation of value and the protection of shareholders' interests, with an appropriate level of investor return, by offering the highest standards of quality in the supply of goods and services to customers, and through the recruitment, motivation and development of the most able and highly skilled professionals. Navigator will always promote a meritocratic culture which allows the personal and professional development of its Collaborators and, through their commitment, position Navigator's business at the forefront of the markets in which it operates, maintaining a policy on the sustainable management of natural resources, mitigation of environmental impacts and fostering social development in the areas in which it carries on its business operations.

Due to their being core principles and of a general nature, the matters governed in the Code of Ethics and Conduct may be detailed in internal guidelines, policies and procedures, or in specific codes of conduct.

3. Values

The principles and rules of conduct set out in the Code of Ethics and Conduct result from the establishment of values deemed to be fundamental to Navigator, and which should be permanently pursued within its corporate activity, in particular:

(a) Trust – We believe in people, we welcome everyone's contribution, we respect their identity, promoting development, cooperation and communication;

(b) Integrity – We are guided by principles of transparency, ethics and respect in our dealings amongst ourselves and with others;

(c) Entrepreneurship – We are passionate about what we do, we like to get out of our comfort zone, we have the courage to take decisions and to accept risks in a responsible way;

(d) Innovation – We seek to bring out everyone's skills and creative potential to do the impossible;

(e) Sustainability – Corporate, social and environmental sustainability is our business model;

(f) Excellence –In our work we focus on quality, efficiency, safety and getting it right.

II. Scope of Application and Interpretation

4. Scope of Application

The Code of Ethics and Conduct applies to all Collaborators of all entities in Navigator Group.

The rules set out herein should govern the ethical and professional conduct of all those working in The Navigator Group, in the pursuance of its corporate activity and in their relationships with third parties and are an essential tool of the corporate policy and culture followed and fostered by Navigator.

5. Interpretation

For the purposes of this Code of Ethics and Conduct, the following defined terms shall have the following meanings:

(a) Collaborators – Any person who, irrespective of their position at Navigator, has a permanent or temporary employment relationship with Navigator, as well as any person with employment and/or regular employment relationship with companies subcontracted by Navigator who, directly or indirectly, perform duties for Navigator (members of corporate sbodies, employees, service providers, agents, auditors and consultants);

(b) Clients – natural or legal persons to whom Navigator Group companies supply their products or provide their services;

(c) Suppliers – natural or legal persons who supply products or provide services to any Navigator Group entity;

(d) Group – the Navigator Group comprises all legal persons over which The Navigator Company exercises, directly or indirectly, a dominant influence, including, but not limited to, all companies in a control or group relationship with The Navigator Company;

(e) Stakeholders – natural or legal persons with whom the Navigator Group companies relate in their business, institutional or social activities, including shareholders, members of governing bodies, Employees, Customers, Suppliers, business partners or members of the community with which the Navigator Group interacts.

III. Rules of Conduct

6. Compliance with Legislation and Regulation

The activities of Navigator and its employees shall be guided by strict compliance with the legal, statutory and regulatory rules applicable to the Navigator Group's business and companies in the jurisdictions in which they operate, as well as strict compliance with the internal instruments it has implemented.

7. Public Authorities

Navigator's conduct and that of its Employees shall be guided by ongoing cooperation with the public authorities, in particular the regulatory authorities, complying with requests legitimately addressed to them and within their reach, and adopting behaviour that enables them to exercise the powers entrusted to those authorities.

8. Integrity

Any practice of corruption and bribery, in all its active and passive forms, whether through acts and omissions or through the creation and maintenance of favourable or irregular situations, as well as the adoption of behaviour that may create expectations of favouritism in interlocutors in their relations with Navigator, as set out in the Policy for the Prevention of Corruption and Related Offences.

9. Transparency

Navigator is committed to report its performance in a transparent way, taking into consideration applicable legal duties and good practices of the capital and financial markets.

10. Confidentiality

10.1. Collaborators must keep the confidentiality of all information concerning The Navigator Group, other Collaborators, Clients, Suppliers or Stakeholders, of which they have knowledge by virtue of carrying out their duties and which is not publicly known or notorious. Such information is restricted and only for internal use in The Navigator Group.

10.2. Collaborators must maintain confidential the information mentioned in the previous paragraph, even after termination of their functions in Navigator and regardless of the cause of such termination.

10.3. Confidential information may only be disclosed to third parties in accordance with legal requirements or provided disclosure thereof is previously authorized, in writing, by the Board of Directors.

11. Business information, insider information and Securities Transactions

11.1. Employees must not use business information obtained in the course of their duties at Navigator to take advantage of illicit business opportunities.

11.2. Employees in possession of specific and concrete information concerning The Navigator Company that has not been made public, but which, if made public, would be likely to have a significant influence on The Navigator Company's

share price, may not, during the period prior to its disclosure, trade in securities of Navigator, strategic partners or companies involved in transactions or relations with Navigator, nor disclose such information to third parties.

11.3. Types of inside information include estimates of results, decisions regarding acquisitions, sales or significant partnerships and the acquisition or loss of relevant contracts.

12. Conflicts of Interest

12.1. Navigator undertakes to adopt measures to ensure that it is exempt from acting in decision-making processes in cases of potential conflict of interest involving Navigator or its Employees. For the purposes of this Code, an Employee shall be in conflict whenever he/she has a personal or private interest in a particular business relationship or activity carried out, which may constitute an advantage for him/herself or for a third party related to him/her, in particular to whom he/she is linked by kinship, proximity or influence.

12.2. Employees may not pursue private objectives in competition with Navigator, and are also prevented from obtaining personal benefits, advantages or favours by virtue of the position held or duties performed.

12.3. Employees must immediately report to their superior any situation that may constitute a conflict of interest as soon as they become aware of it, particularly if, in the course of their duties, they are called upon to intervene in proceedings or decisions involving, directly or indirectly, organisations, entities or persons with whom they collaborate or have collaborated, or to whom they are linked by ties of kinship, proximity or influence. In addition to these, in any other cases where their impartiality may be questioned, they must make that communication, as detailed in the Policy for the Prevention of Corruption and Related Offences and in the Regulation on Conflicts of Interest and Related Party Transactions.

13. Shareholder relations and governance

13.1. Navigator's primary objective is to protect the interests of shareholders and investors, and to seek to create value for shareholders.

13.2. Navigator undertakes to respect the principle of equal treatment of shareholders, taking into account their proportions in the share capital of The Navigator Company, namely by ensuring that information is made available in a timely manner, in compliance with applicable legal duties.

13.3. Navigator discloses annually in its corporate governance report the governance practices applied and incorporates national and international best practices in this area.

14. Competition

The competition practices of Navigator shall comply strictly with applicable competition laws, in accordance with market rules and criteria, and with a view to promoting fair competition.

15. Intellectual and Industrial Property

Navigator and its Collaborators must respect Intellectual and Industrial Property of Suppliers, Clients and Stakeholders.

16. Relations with Clients, Suppliers, Services Providers and Third Parties

16.1. Navigator shall ensure that the terms and conditions for the sale of products to its Customers are clearly defined, and Group companies and their Employees shall ensure that they are complied with.

16.2. Navigator's Suppliers and service providers shall be selected on the basis of objective criteria, taking into account the conditions proposed, the guarantees actually given and the overall optimisation of benefits for Navigator.

16.3. Navigator's Suppliers and service providers shall comply with the provisions of The Navigator Company's Code of Conduct for Suppliers.

16.4. Navigator and its Employees shall at all times negotiate in compliance with the principles of good faith and the applicable legal obligations and best practices.

16.5. In order to ensure that Customers, Suppliers, Service Providers and other third parties pursue legitimate activities, whose sources of income are lawful and which do not represent a direct or indirect risk of criminal practices, the relations established with them must comply with the provisions of the applicable internal policies and procedures.

17. Relations with Political Parties and Movements

17.1. Navigator's and its Employees' relations with political

movements or parties, where they exist, shall be conducted in compliance with the legal provisions and internal instruments in force.

17.2. If Navigator's Employees make contributions of the nature described in their personal capacity, they must take into account any conflict of interest with their professional responsibility and refrain from invoking their relationship with Navigator.

18. Social Responsibility and Sustainable Development

18.1. Navigator accepts its social responsibility to the communities in which it carries on its business activities, as a means of contributing to their advancement and well-being.

18.2. Navigator undertakes to adopt, comply with and promote a Policy on sustainability and environment protection.

19. Safety and Working Conditions

19.1. Navigator will never employ child or forced labour, nor will it ever collude with such practices, and it shall adopt the measures deemed appropriate to combat such situations, notably by public denunciation, whenever they come to its attention.

19.2. The health and safety of its Collaborators is a priority for Navigator, and accordingly all Collaborators shall seek to know and comply with the legislation in force and with internal rules and recommendations on such matters.

19.3. Employees must immediately report any accident or situation that may compromise hygiene, safety and health in the workplace, in accordance with the applicable rules, and the preventive measures that prove necessary or recommendable must be adopted.

20. Professional development and progression

20.1. Navigator provides appropriate training activities to its Collaborators and fosters their continued training, as a driver of their motivation and improved performance, recognizing the added value of their professional and personal development.

20.2. Navigator values and holds responsible Collaborators in the performance of their functions, taking into consideration their individual merit, allowing them to assume the level of independence and responsibilities associated with their skills and commitment.

20.3. The selection, hiring, remuneration and professional development policies adopted are guided by merit criteria and market reference practices.

20.4 Navigator shall ensure equality of opportunities and respect for gender equality in recruitment, hiring and professional development, attaching value only to professional aspects. To that effect, all Collaborators shall adopt the measures deemed appropriate to combat and prevent any form of discrimination or differentiated treatment based on, notably, ethnic or social origin, religious beliefs, nationality, gender, marital status, sexual orientation or physical disability.

21. Respect

In their relations with other Collaborators and Suppliers, counterparts, Clients and Stakeholders, all Collaborators shall proactively act in a correct, respectful, loyal and civil manner.

22. Non-discrimination and harassment

22.1. Collaborators may not act in a discriminatory manner in relation to other Collaborators or other persons, notably based on race, religion, gender, sexual orientation, origin, age, language, territory of origin, political or ideological convictions, economic situation, social and economic situation or type of contract, and must foster respect for human dignity as one of the basic principles of the culture and policy of Navigator.

22.2. Any practice which may correspond to a form of harassment, notably through personal offence, mobbing, moral or sexual harassment or bullying is strictly forbidden, under the terms of the Whistleblowing Regulation and the Code of Good Conduct on Preventing and Combating Harassment at Work.

23. Use of Assets

23.1. Collaborators shall make sensible and reasonable use of the working resources at their disposal, avoiding waste and undue use.

23.2. Collaborators shall care for the property of Navigator and not behave wilfully or negligently in any manner which might undermine its state of repair.

24. Personal Data Protection

24.1. Navigator understands the key role of privacy and protection of personal data of its Clients, Stakeholders, Suppliers, Collaborators or any other natural persons or collaborators of any other entities. Accordingly, Navigator and its Collaborators undertake to use such information in a responsible manner, in strict compliance with laws and regulations governing the protection of personal data.

24.2 Collaborators must not collect personal data, create lists of personal data or process or transfer personal data without prior consultation and authorisation from the area which is responsible for data protection.

25. External Communication – Media and Advertising

Information provided by Navigator and its Collaborators to the media, including for advertising purposes, shall:

(a) Be released exclusively by management and divisions authorised for that purpose and to act as representative or spokesman of Navigator;

(b) Comply with the principles of legality, accuracy, opportunity, objectivity, truthfulness and clarity;

(c) Protect the secrecy and confidentiality of the information, in order to protect the interests of Navigator;

(d) Respect cultural and ethical parameters of the community and human dignity;

(e) Contribute to an image of consistency, creation of value and dignity of Navigator, promoting its good name in society.

26. Communicating in social networks and media

Collaborators are fully aware that the new forms of communication, which are continually evolving, may have a strong impact on Navigator and its Collaborators and that the dissemination and distribution of information through those channels may easily represent loss of control over those contents.

Accordingly, Collaborators undertake as their commitment that, when using social networks and means of communication (both traditional and recent), they:

Shall act in an ethically responsible way, contributing to the creation of value and dignity of The Navigator Group and to reinforce its image in society;

Shall respect, comply with and reflect the principles, values and rules of conduct established in this Code of Ethics and Conduct;

Shall not post or otherwise disclose confidential or internal information of Navigator;

Shall not communicate, identifying themselves as Collaborators of Navigator, without authorization for that purpose.

IV. Supervision, Default and Communication

27. Non-compliance

Failure to comply with the rules of conduct established in this Code of Ethics and Conduct shall constitute serious misconduct, subject to disciplinary proceedings, in addition to any possible civil, administrative or criminal liability, in accordance with applicable laws and regulations.

28. Reporting

28.1. Collaborators should report the occurrence of any conduct which is not compatible with the rules set out in this Code of Ethics and Conduct, of which they are aware or justifiably suspicious, in a timely and efficient way, through the proper channels, in accordance with the internal rules of the Whistleblowing Regulation and the Code of Good Conduct for Preventing and Combating Harassment at Work.

28.2. Navigator guarantees the confidentiality of information conveyed in reports, in accordance with the internal rules of the Whistleblowing Regulation.

28.3. Navigator shall not retaliate, in any way, against a person who reports any non- compliance with the Code of Ethics and Conduct or another irregularity, shall ensure a fair treatment of the persons addressed therein and will not allow the resulting detrimental treatment where a Collaborator has acted in good faith, thoughtfully and diligently.

28.4 In accordance with the general terms of the law, misuse or abuse of the arrangements for reporting irregularities may render the author of a report liable to disciplinary measures and/or legal proceedings.

29. Criteria for action, doubts and questions

Employees must act in accordance with this Code of Ethics and Conduct and with good judgment, assessing the alignment of their conduct with the company's risk culture and policy, including from the point of view of reputational risk, and its appropriateness in the event of public disclosure.

Employees may submit doubts and questions regarding the interpretation or application of the Code of Ethics and Conduct to the Compliance Area, through the following email address compliance@thenavigatorcompany.com.

30. Reporting of Irregularities

Any non-compliance with the provisions of this Code must be reported in accordance with The Navigator Company's Whistleblowing Regulations.

31. Annual Report

31.1. The Ethics Committee shall draw up an annual report on compliance with the rules established in this Code of Ethics and Conduct, detailing all irregularities of which it is aware, and setting out the conclusions and follow-up proposals adopted in the different cases which it examined.

31.2. For the purposes of the preceding paragraph, the Risk Management and Compliance Area shall report to the Ethics Committee all relevant facts which come to their attention.

V. Communication

32. Communication of the Code of Ethics and Conduct

32.1. The Navigator Company's Code of Ethics and Conduct shall be disclosed on Navigator's digital internet platform and together with the annual financial statements, so that it may be known to Shareholders, Customers, Suppliers, Stakeholders, Investors and other entities with whom the Navigator relates.

32.2.Navigator shall make the Code of Ethics and Conduct available to all Collaborators and will promote its dissemination, widespread awareness and mandatory practice.

Lisbon, July 21, 2023

The Board of Directors,

The Navigator Company, S.A.

Share Capital 500 000 000 Eur

Corporate Entity 503 025 798
Registered at the Commercial
Register of Setúbal

Headquarters Península de Mitrena
Freguesia do Sado, Setúbal