

## **NAVEX Group's Modern Slavery Statement**

NAVEX Global, Inc., NAVEX Global UK Limited, WhistleB Whistleblowing Centre AB, and their affiliates and subsidiaries (collectively, "NAVEX"), offer this statement on slavery, forced labour, involuntary servitude, and human trafficking (together, "modern slavery").

NAVEX is the world's leading provider of governance, risk, and compliance management software, delivering a unified software-as-a-service platform to over 13,000 customers worldwide. NAVEX is committed to doing business the right way, and this commitment includes our unambiguous opposition to all forms of modern slavery.

We assess the risk of modern slavery within our organisation to be low due to the nature of our business and our established personnel practices. Robust safeguards exist in our recruiting, hiring, and onboarding processes to ensure candidates and employees are of legal working age, are acting of their own free will, and will be fairly compensated. All NAVEX employees annually complete mandatory trainings that underscore NAVEX's commitment to fair, ethical, and equitable business practices. These trainings reinforce the principles stated in our <u>Code of Conduct</u>, to which all employees annually attest. NAVEX employees also have a duty to report issues of suspected noncompliance through any of our available reporting channels, including our anonymous and confidential web-based reporting portal.

The risk of modern slavery in our supply chain is similarly assessed to be low. Our supply chain includes a small number of providers that directly support our services, and NAVEX expects each provider to operate consistent with the principles of our <u>Supplier Code of Conduct</u>. Each provider that directly supports our services is subject to ongoing oversight and risk mitigation that includes continuous monitoring for reputational risk. Likewise, we include appropriate contractual provisions in our provider agreements to mitigate modern slavery risk in the supply chain, including unqualified commitments to comply with all applicable laws.

NAVEX is also in the privileged position of an "impact multiplier" because we develop and provide software solutions that thousands of organisations worldwide use to mitigate modern slavery risks in their operations and supply chains. These solutions enable our customers to dynamically monitor and manage third-party and enterprise risks, report on sustainability initiatives, communicate business ethics standards to employees and stakeholders through policy distribution and topical trainings, and receive reports of suspected noncompliance. In short, we provide organisations with tools to operationalise their commitments to maintain ethical business practices and combat modern slavery throughout their value chains.

We will remain committed to vigilantly opposing modern slavery in our sphere of influence and will adapt our operations and procedures as necessary to do so, all while supporting similar efforts of thousands of organisations worldwide.

This statement is approved and signed on behalf of our Board of Directors.

Sean Thompson
Sean Thompson (Apr 16, 2024 20:09 PDT)

Sean Thompson
Chief Executive Officer and Director