

STATEMENT AGAINST SLAVERY, FORCED LABOUR AND HUMAN TRAFFICKING

NAVEX Global, Inc. and its sister companies and subsidiaries, including GCS Compliance Services Europe Unlimited Company (trading as NAVEX Global), NAVEX Global UK Limited, Lockpath, Inc., WhistleB Whistleblowing Centre AB, Expolink Europe Limited, and Expolink Group Limited (collectively, “NAVEX Global”), offer this statement on slavery, forced labour and human trafficking (“modern slavery”), as required by the UK Modern Slavery Act of 2015.

NAVEX Global is the world’s leading provider of risk and compliance software, delivering a suite of SaaS-based solutions to more than 13,000 customers worldwide. As in all aspects of our operations, NAVEX Global is committed to doing business the right way. This commitment includes our unambiguous opposition to all forms of modern slavery.

NAVEX Global’s over-arching commitment to ethical conduct is embodied in our Code of Conduct, reinforced by employee trainings, and lived by our employees every day. Due to the nature of our business, we do not see a substantial risk of modern slavery in our supply chain. Nonetheless, our Code of Conduct and trainings encourage our workforce to report suspected unethical or unlawful conduct, including modern slavery. We strive to work with business partners that share our respect for human rights. Similarly, our hiring processes ensure that all of our employees work out of their own free will.

But it is not just NAVEX Global’s internal commitment and actions that combat modern slavery. Thousands of NAVEX Global customers utilise our solutions to minimise the conditions under which modern slavery may occur, including through receipt and investigation of reports of suspected noncompliance with law, employee trainings, and third-party and integrated risk management.

Looking forward, we are committed to remaining vigilant in opposing modern slavery and will adapt our operations and procedures as necessary to combat modern slavery.

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

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worldwide. As in all aspects of our operations, NAVEX is committed to doing business the right way. This commitment includes our unambiguous opposition to all forms of modern slavery.

Due to the nature of our services and established personnel processes, we assess the risk of modern slavery within our organisation to be low. Robust safeguards exist in our internal personnel practices, including our recruiting, hiring and onboarding processes. We also deploy focused, material employee trainings and guidance that reinforce our commitment to ethical business practices. All employees and stakeholders are encouraged to raise issues of suspected noncompliance through any of our available reporting channels, including our anonymous and confidential web-based reporting portal. Each of these items mitigates an already low risk of modern slavery in our organisation.

The risk of modern slavery in our supply chain is similarly assessed to be low. Our supply chain is limited to a small number of providers with minimal turnover. Each provider that supports our marketplace offerings is subject to ongoing oversight and risk mitigation that includes continuous monitoring for reputational risk. Likewise, each provider is subject to legally binding terms and conditions with NAVEX that include unqualified commitments to comply with all applicable laws.

Importantly, it is not just NAVEX's own internal commitment that combats modern slavery. NAVEX provides software solutions to thousands of organisations throughout the world that are used to minimise the conditions under which modern slavery may occur. These marketplace offerings enable our customers to dynamically monitor and manage third-party and enterprise risks, analyse and report on sustainability initiatives, communicate their business ethics standards to employees through policy distribution and trainings, and receive reports of suspected noncompliance. In short, we provide these customers with the tools to operationalise their commitments to ethical business practices and combatting modern slavery.

Looking forward, we are committed to remaining vigilant in opposing modern slavery 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 by and signed on behalf of our Board of Directors.

A handwritten signature in black ink, appearing to read "Bob Conlin". The signature is fluid and cursive, with the first name "Bob" and last name "Conlin" clearly distinguishable.

Bob Conlin
President, CEO and Director