

Our Code of Conduct

Doing the Right Things Right

NAVEX®

Click to Get Started



A Message From Our CEO



When you joined NAVEX, you joined a team committed to shaping the future of risk and compliance. For more than 35 years, we've partnered with organizations around the world to help them navigate complexity and stay confident in the face of change.

That experience gives us a strong foundation, but it's not where we stop. The challenges businesses face today – from global regulation to shifting risks and new technologies – demand new ways of thinking and acting. Our goal isn't just to keep pace. We're here to transform how the world manages risk and compliance, making it simpler, smarter and more connected.

What sets NAVEX apart isn't just our drive. It's how we choose to act. Every day, we live our values by **Doing the Right Things Right**. As the world around us evolves with new technology, regulations and challenges, we maintain our momentum by staying true to what grounds us: our Code of Conduct.

Our Code is more than a rulebook. It's the foundation of our culture. It guides how we work, how we treat each other and how we make decisions that reflect our values. It also reminds us to speak up when something doesn't feel right. The Code sets the standard for what's expected of us and what we can expect from everyone we work with.

When we follow the Code, we show the world exactly who NAVEX is: the highest-performing team with the highest ethical standards. That's why I encourage you to read the Code and use it in your daily work. And remember, you're not alone. We've built resources and a dedicated team ready to support you whenever you have a concern, need guidance or have questions.

I'm glad we're on this journey together, and I know our continued success depends on our commitment to integrity and the choices we make every day.

This is how we lead, this is how we succeed, this is **NAVEX**.

A handwritten signature in black ink that reads "Andrew Bates".

Andrew Bates

CEO, NAVEX



Our Vision and Values

OUR VISION

Transform how the world manages Risk and Compliance.

Deliver the world's smartest integrated platform that empowers organizations to proactively mitigate risk and ensure compliance.

Simple, Smart & Connected.

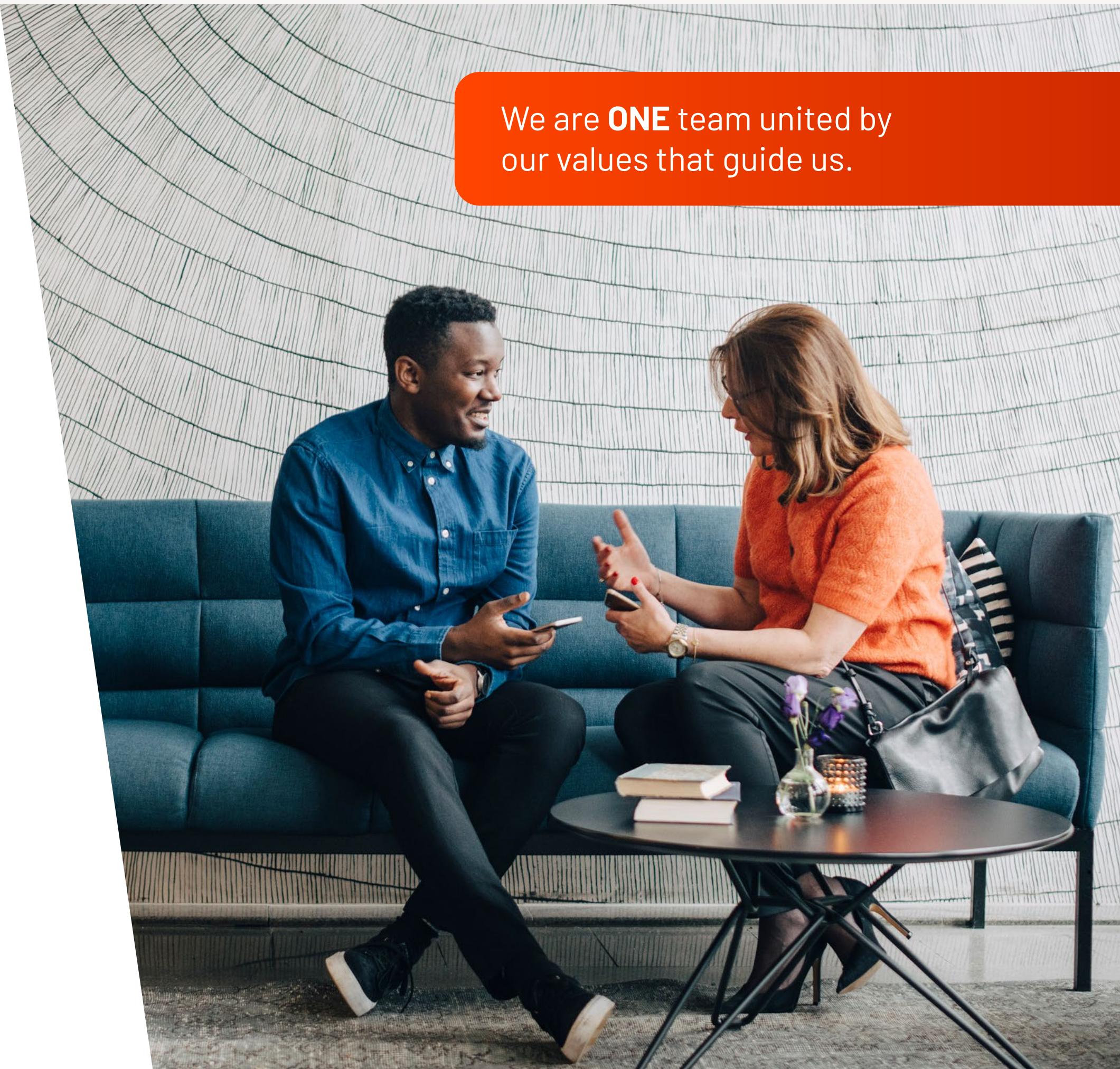
OUR VALUES

We DO the right things right.

We DELIVER extraordinary value.

We INSPIRE greatness.

We are **ONE** team united by our values that guide us.



A Message From Our CEO	2	Our Commitment to Our Customers and Business Partners	
Our Vision and Values	3	Confidential and Proprietary Information	17
Doing the Right Things Right		Business Partners and Supplier Relations	18
How to Use Our Code of Conduct	6	Gathering Competitive Intelligence	18
Who Must Follow Our Code	6	Conflicts of Interest	19
Our Responsibilities	7	Gifts and Entertainment	20
Raising Concerns and Seeking Guidance	8	Accurate Records	21
Protection from Retaliation	8	Public Communications and Social Media	22
Making the Right Choice	9	Our Commitment as a Responsible Corporate Citizen	
Our Commitment to One Another		Corporate Responsibility	24
Inclusive Workplace	11	Anti-bribery and Corruption	25
Fairness and Equality	11	Fair Competition	26
Harassment-free Workplace	12	Insider Trading	27
Safety and Physical Security	13	Political Activity	27
Protection of Systems and Resources	13	Global Trade Restrictions	28
Privacy and Personal Data	14	Acknowledgment	29
Artificial Intelligence	15	Resources	30
		A Closing Message From Our Chief Risk and Compliance Officer	31

We want to be proud not only of what we achieve but how we achieve it.

Doing the Right Things Right

How to Use Our Code of Conduct	6
Who Must Follow Our Code	6
Our Responsibilities	7
Raising Concerns and Seeking Guidance	8
Protection From Retaliation	8
Making the Right Choice	9



How to Use Our Code of Conduct

Our Code is your resource.

Situations involving ethics and compliance can be complicated, and sometimes it's difficult to know what to do. We want you to have the information you need to do the right things right every day. Our Code of Conduct is designed to guide you when the rules aren't clear.

We comply with all laws that apply to our business. We also know that we are held to a higher standard by the marketplace because of the work we do, so our values play an important role in determining our actions.

Because we conduct business internationally, our policies may sometimes differ from local practices and cultural norms. Where there appears to be a conflict, you should typically follow the more restrictive requirement; however, if doing so would violate our values or if you are unsure about the right course of action, contact your manager, human resources, legal or compliance for guidance.

You may always access our Code of Conduct via the company's intranet site, our policy management platform and on our [Code of Conduct website](#).

WHAT IF ...

I'm facing a situation that is not covered in our Code. What should I do?

Our Code can't address all the issues that may arise at work. Check our policies first. If the answer is still unclear, ask for help. Start with your manager or any of the resources identified in our Code.

Who Must Follow Our Code

Our Code applies to every team member and our Board of Directors.

We all have a shared duty to make responsible decisions, represent NAVEX with integrity and help each other and the company to succeed. We expect the individuals and organizations that support our business, whether as independent contractors, key suppliers or one-time vendors, to share our commitment to doing the right things right, and we maintain a [Supplier Code of Conduct](#) that outlines these expectations.

In rare cases, you may be able to request a waiver or exception to a part of our Code. Be sure to contact compliance in advance to request such a waiver. If our executive officers and directors seek waivers, they must receive advance approval from our Board of Directors.



Our Responsibilities

Every team member has a responsibility to maintain our reputation for high ethical standards.

This means that you should:

- **Be professional, honest and ethical** in everything you do on behalf of NAVEX
- **Treat** everyone with civility, fairness and respect
- **Know our Code** and the laws and policies that relate to your job
- **Complete all required training** and apply it to the work you do every day
- **Ask questions** anytime you're unsure about the right way forward
- **Report concerns** about possible violations of our Code, our policies or the law
- **Cooperate and tell the truth** when responding to an investigation or audit
- **Be accountable for your actions** – violating our Code, our policies or the law is grounds for corrective action, up to and including separation from NAVEX

If you manage people, you have an even greater responsibility to:

- **Uphold our values** by leading with integrity and compassion
- **Promote an inclusive experience** that enables team members to be themselves
- **Serve and support team members** to help them thrive in life
- **Create a safe space** for team members to raise questions, concerns and opinions
- **Consistently coach team members** with transparency and clarity to ensure they know what is expected
- **Report suspected violations** of our Code, our policies or the law
- **Never retaliate** or allow others to retaliate against team members who raise concerns



Raising Concerns and Seeking Guidance

Part of doing the right things right means voicing what matters.

We understand the importance of speaking up and seeking guidance on tricky issues – after all, promoting a speak-up culture is our business. It's not only important for our customers, but for us, too.

Speak up if you need guidance when the rules aren't clear or wish to report a possible violation of our Code, our policies or the law.

You have several options:

- **Talk to your manager**, compliance, human resources, legal or any executive team member
- **Use our online reporting system:**
NAVEX4NAVEX.com

Your report will be kept confidential to the fullest extent possible, consistent with the law and good business practices. You may report anonymously unless prohibited by law.

Regardless of the method you use to report, or whether you choose to be anonymous, we will investigate your concerns and follow up as necessary.

If you do choose to report anonymously, please provide as much detailed information as possible and check back to see if we have posted any requests for additional information. When you share your concerns, we have the opportunity to address and resolve issues before they become more serious.

Protection from Retaliation

If you ask a question, report possible misconduct or take part in an investigation, you are following our Code and doing the right thing.

NAVEX will not tolerate retaliation against you. Retaliation can take many forms, from being unfairly dismissed to being the target of bullying or derogatory comments by managers or peers.

We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate corrective action. We consider acts of retaliation to be acts of misconduct which, if substantiated, could result in disciplinary action and possibly separation from NAVEX.



Making the Right Choice

If you're faced with a dilemma and you're not sure what to do, a good starting point is to ask yourself:



IS IT LEGAL?



DOES IT ALIGN
WITH OUR POLICIES?



IS IT CONSISTENT
WITH OUR VALUES?



IS IT IN THE
COMPANY'S
BEST INTERESTS?



WOULD I BE
COMFORTABLE WITH
MY DECISION IF IT
WERE MADE PUBLIC?



If your answer to any of these questions is **“NO,”** stop and [seek further guidance](#).

We understand that the true measure of how we view our work starts with how we treat each other.

Our Commitment to One Another

Inclusive Workplace	11
Fairness and Equality	11
Harassment-free Workplace	12
Safety and Physical Security	13
Protection of Systems and Resources	13
Privacy and Personal Data	14
Artificial Intelligence	15



Inclusive Workplace

We invite, value and benefit from the unique and wonderful perspectives and experiences each team member brings to our organization.

It's important for us to attract people and build teams that reflect our global footprint. When our teams include people with varied backgrounds, talents and ideas, we are connected, more dynamic and successful. That's why we value every team member as an important contributor to NAVEX.

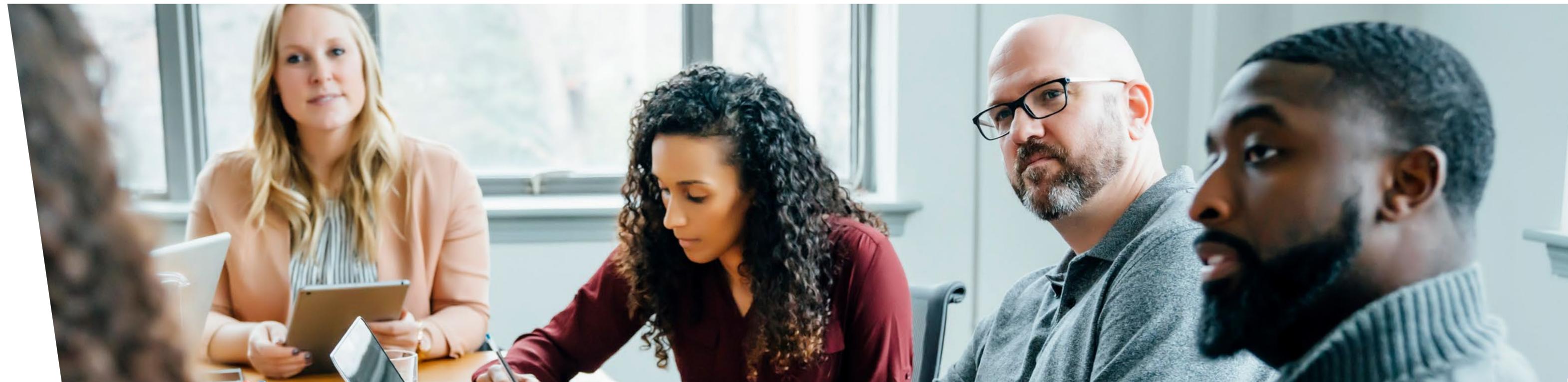
- **Honor and appreciate the uniqueness** of each team member
- **Treat others with respect** – each of us has the right to a workplace where the differences we bring are welcomed and valued
- **Listen, learn and be open** to new ideas and points of view

Fairness and Equality

We believe that everyone should be treated with fairness, respect and dignity.

We are committed to nondiscriminatory employment practices and make employment decisions based on an individual's qualifications and performance, not on protected or immutable characteristics. We work collaboratively with qualified team members and applicants who need reasonable accommodations.

- **Be mindful** of how your personal biases may affect your thinking
- **Base employment decisions on qualifications, skills and achievements** without regard to age, race, color, sex, gender, religion, nationality, sexual orientation, gender identity or expression, mental or physical ability, thinking style, veteran status, genetic information, protected leave or any other characteristic protected by law
- **If you are a hiring manager**, complete required training related to hiring and developing people



Harassment-free Workplace

We do not tolerate any form of harassment, including sexual harassment and bullying.

Workplace harassment can take many forms and be experienced differently from one individual to another. It can include unwanted sexual advances or physical contact, requests for sexual favors and any other sexually offensive behavior. All types of harassment are strictly prohibited and could result in immediate separation from NAVEX.

- **Help create a welcoming and thriving work environment** that is free of all forms of harassment
- **Maintain our high standards** of professional conduct at all times, including when working with customers and business partners, during and after business hours, and in all onsite and offsite business settings

For our team members in India and those managing teams in India, NAVEX maintains an Internal Committee and reporting procedure under India's POSH Act. You may learn more in our POSH Policy.

WHAT IF ...

One of my coworkers emailed a sexually explicit joke to our whole team that was uncomfortable for me. Should I say something?

Yes. It is important to report this to human resources or compliance. And if you feel comfortable, respectfully let your coworker know how you felt about their email, with the goal of using this conversation to learn and grow together.



Safety and Physical Security

When working, always be alert to health and safety risks to protect yourself and your colleagues.

Be sure that your work performance is not impaired by alcohol or drugs. This applies whenever and wherever you are representing NAVEX.

Weapons are not permitted at any time while on any property owned, leased or controlled by NAVEX or anywhere you are conducting NAVEX business, such as customer locations, trade shows, restaurants and company events. Weapons include guns, knives, swords, explosives and any other dangerous object.

Promptly **report**:

- **Any accident**, injury or unsafe or unhealthy condition
- **Any threats**, intimidation or acts of violence

Protection of Systems and Resources

We trust you to use company assets appropriately and protect them from loss, damage, theft and improper use.

These assets – including our offices, property and equipment, team member time, and confidential and proprietary information – drive our success and our competitive advantage.

- **Protect company resources** from loss or harm
- **Don't use, borrow or loan** company assets without permission
- **Be aware** that our computer equipment, email accounts and internet access are for business purposes, though some limited personal use is acceptable
- **Follow our procurement process** before adopting new software or technology, including artificial intelligence tools
- **Protect** your user IDs and passwords from disclosure

Please refer to People Programs & Practices and our Information Security Policy for specific guidelines on appropriate use of our assets.



Privacy and Personal Data

Keep personal data safe and secure.

Always respect the privacy of others and the confidentiality of personal data – both the personal data of coworkers and the personal data entrusted to us by our customers and business partners.

Due to their role, some team members may also have access to the confidential health information of others (including our own team members, as well as within reports that we take on behalf of our customers).

Examples of personal data include an individual's:

- Physical, email and IP addresses
- Phone number
- Employee identification number
- Pay or performance information
- Credit card number
- Banking or payroll information
- Identifying information, whether used alone or with other information

- **Understand** what information is considered personal data
- **Use care** to collect, access, use and share personal data in accordance with applicable data privacy laws, regulations and our policies
- **Follow our procurement and vendor review process** before allowing any software – including artificial intelligence – to access and process any personal data
- **Limit access to and disclosures of personal data** only to individuals with a legitimate business need to access the personal data
- **Retain personal data** only for as long as necessary to accomplish the legitimate purpose for which it was collected
- **Follow our policies and procedures** when transferring any personal data outside its country of origin
- **Immediately report** any suspected breach of personal data, whether intentional or accidental, to your manager



Artificial Intelligence

We are committed to the responsible and ethical adoption of emerging technologies and to protecting the confidential information of NAVEX and our customers.

All of us share a responsibility to manage risks associated with AI. Always keep these guidelines in mind:

- **Never load confidential information of NAVEX or any customer into any AI** that has not been reviewed and approved for that specific use by our legal and security teams
- **Verify the accuracy** of AI outputs before circulating, endorsing or incorporating them in your work
- **Follow NAVEX's procurement process** if you want to begin using a new AI tool
- **Always prioritize AI providers** that demonstrate a commitment to fairness and transparency in their development and deployment of their AI

AI is developing rapidly, which requires that all NAVEX team members remain committed to protecting NAVEX and the data entrusted to us by thousands of customers worldwide.



Working together with our customers and business partners, we make a positive difference in the lives of others.

Our Commitment to Our Customers and Business Partners

Confidential and Proprietary Information	17
Business Partners and Supplier Relations	18
Gathering Competitive Intelligence	18
Conflicts of Interest	19
Gifts and Entertainment	20
Accurate Records	21
Public Communications and Social Media	22



Confidential and Proprietary Information

Our work requires that we take the utmost care with information we learn or access at NAVEX.

We uphold our promises and contractual obligations to keep the confidential information of our customers and business partners safe and secure.

- **Only share confidential customer and business partner information** with those who are authorized and have a genuine need for it to do their jobs
- **Honor third parties' intellectual property rights**, including those of our customers, business partners and competitors
- **Be aware** that the confidentiality obligations we all have as NAVEX team members cover the confidential information of our customers and business partners and require us to maintain that confidentiality even after our employment with NAVEX ends

As part of our commitment to confidentiality, our Contact Center team members sign a monthly re-affirmation pledge to protect customers' confidential information.



Business Partners and Supplier Relations

We seek business partnerships that align with our values and follow the highest standards of business conduct.

All arrangements with our business partners require a written agreement with NAVEX to ensure we protect our and our customers' interests.

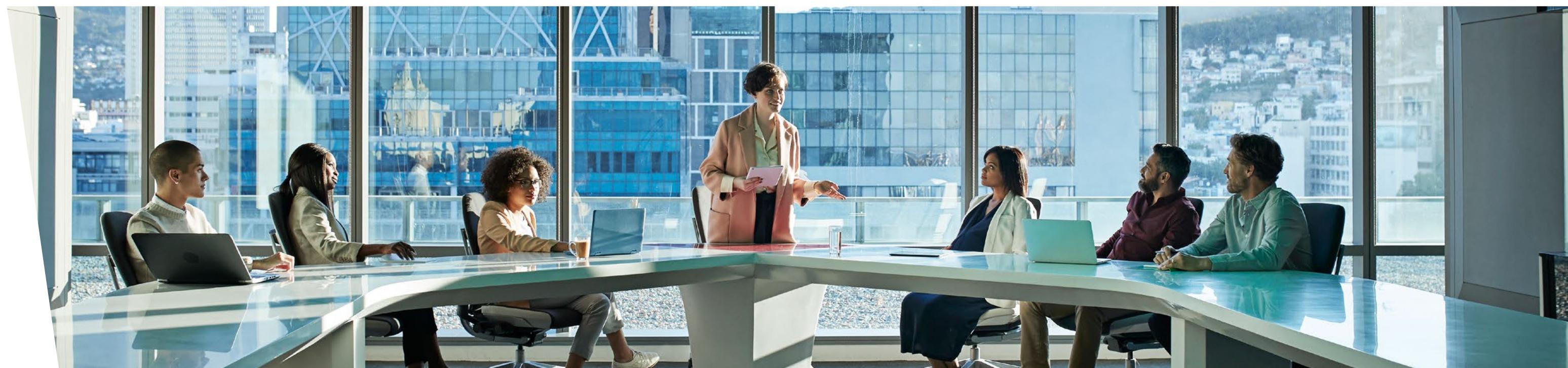
- **Always follow our procurement** and approval processes
- **Conduct due diligence** on new suppliers and agents acting on our behalf
- **Help suppliers understand** our risk and compliance standards and their contractual obligations
- **Be aware that additional rules may apply** when we provide services to governments and government contractors – team members working with any government entity have an additional responsibility to know, understand and follow the laws and regulations pertaining to that work
- **Report** any supplier or business partner that may be violating the law or not meeting our compliance and ethical standards

Gathering Competitive Intelligence

Information about competitors is valuable in today's business environment.

When gathering business intelligence, team members and others working on our behalf must always abide by the highest ethical standards.

- **Never engage in fraud, misrepresentation or deception** to obtain information or use technology to spy on others
- **Be careful** when accepting information from third parties. Verify the information and ensure that the information they provide is not protected by nondisclosure or confidentiality agreements
- **Do not use or disclose** a former employer's confidential information or violate active non-solicitation agreements you may have signed



Conflicts of Interest

A conflict of interest occurs when our personal activities or relationships impact our ability to make objective business decisions.

The best way to avoid potential conflicts is to know and avoid the kinds of situations where conflicts may arise. Any situation that makes others question our objectivity can erode the trust that others place in us. So, be proactive in disclosing both potential and actual conflicts.

Once disclosed, the situation can usually be managed and resolved.

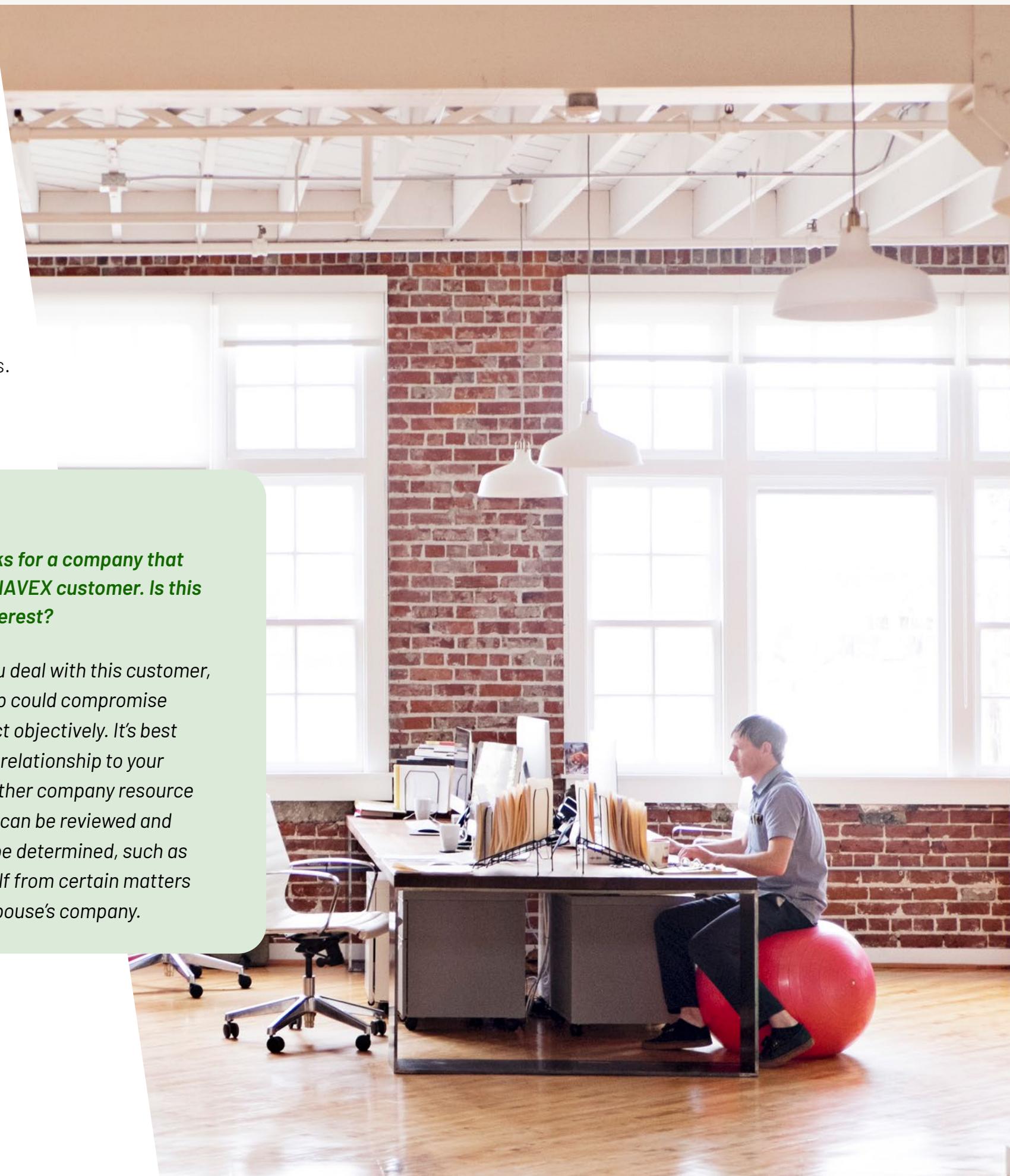
Conflicts of interest can arise in many ways. For example:

- **Outside jobs and affiliations**, especially with competitors, customers or business partners
- **Working with or hiring close relatives, partners or friends**, especially if they report to you
- **Serving as a board member** of another organization
- **Investments** that might influence – or appear to influence – your judgment

WHAT IF ...

My spouse works for a company that has become a NAVEX customer. Is this a conflict of interest?

It could be. If you deal with this customer, your relationship could compromise your ability to act objectively. It's best to disclose your relationship to your manager or another company resource so the situation can be reviewed and next steps can be determined, such as recusing yourself from certain matters involving your spouse's company.



Gifts and Entertainment

Under the right circumstances, a modest gift or meal may strengthen a business relationship, but an offer that is lavish or extended too frequently could cause others to question our objectivity.

We win business based on the quality of our products and services. Never give, accept or ask for any gift or entertainment of any value if the intent is to influence – or if the offer could appear to influence – your ability to make objective business decisions.

For additional information, see our Anti-bribery and Corruption Policy.



WHAT IF ...

During the holidays, one of our vendors sent me a gift card to a local restaurant. May I accept it?

No. A gift card is a cash equivalent, and it would violate our policies to accept it. After notifying your manager, you should politely thank the vendor but return the gift card and let them know about our policy.

- **You may accept an occasional gift** from a customer, vendor or partner if it's modest in value, appropriate for the occasion, intended to foster a business relationship and in line with our Anti-bribery and Corruption Policy
- **You may accept an occasional meal and entertainment** from a customer, vendor or partner if they attend the event with you, the costs are in line with local business customs and our policy and you inform your manager, human resources or compliance
- **If you are offered a gift, meal or entertainment that exceeds our policy's threshold**, thank the offerer, politely decline and notify your manager, human resources or compliance. But if refusing the offer would be considered culturally offensive or insulting, accept it and immediately consult with your manager, human resources or compliance
- **In some situations**, offering or accepting gifts, meals or entertainment may violate the law or another organization's policy. Don't offer anything of value to a government official or government contractor without receiving prior approval from legal
- **Some gifts and entertainment are never acceptable to give or receive**, for example, cash or cash equivalents (such as gift cards) or any gift or entertainment that would harm our reputation (e.g., something that is indecent or improper)
- **Understand** that the recipient may not be permitted to accept a gift, meal or entertainment under their company's policies, and consider asking them in advance if they are allowed to receive it

Accurate Records

Accurate records are essential for good business decisions and for preserving the trust of business partners and government officials.

Some team members have special responsibilities in this area, but we all contribute to the process of recording financial and non-financial information.

- **Be accurate** and complete with our business records
- **Understand and follow** the law and our policies when creating, retaining or destroying records
- **Never destroy or modify documents and records** in response to or in anticipation of an investigation or audit

Records exist in many forms and include:

• Purchase orders	• Proposals
• Benefit claims	• Technical specifications
• Invoices	• Interview notes
• Expense reports	• Time tracking logs
• Financial forecasts	



Public Communications and Social Media

Every communication regarding our company affects our reputation and brand. That's why we ensure that our company's public voice is clear, accurate and consistent.



If you receive an inquiry or request for information from the media or a government representative:

- **Refer media inquiries** (including invitations to speak on behalf of NAVEX at conferences) to the marketing department
- **Refer inquiries from government representatives** to the legal department

Our commitment to communicating responsibly extends to team members' social media activity, too. When engaging on social media:

- **Think before you post** – "private" social media comments and posts can be shared publicly and tend to live for a long time
- **Do not disclose** confidential or proprietary information of NAVEX, our customers or our business partners
- **Respect intellectual property rights** – don't use our, or our customers', trademarks, copyrighted works or trade secrets without permission from the legal department
- **Send requests for employment references** to human resources
- **Never post anything** that would be considered harassing, bullying or discriminatory
- **If you see comments or posts on social media** that you believe are inaccurate or unfairly represent NAVEX or our customers, report the information to marketing, legal or compliance instead of responding

We honor the letter and the spirit of the law in every action we take.

Our Commitment as a Responsible Corporate Citizen

Corporate Responsibility	24
Anti-bribery and Corruption	25
Fair Competition	26
Insider Trading	27
Political Activity	27
Global Trade Restrictions	28



Corporate Responsibility

We are proud of the role we play in the global movement toward greater corporate integrity and social responsibility.

We recognize that our collective future is tied to the everyday actions taken to respect human rights, protect the planet and be a good corporate citizen. It is for this reason that NAVEX is a signatory to the United Nations Global Compact and operates in accordance with its ten principles.



We are committed to:

- **Human dignity and fair employment practices:**
 - **We ensure** that our team members work of their own free will
 - **We do not accept** corporal punishment, forced or involuntary labor, child labor or other forms of mental and physical coercion in our operations or supply chain
 - **We value** business partners that share our standards and commitment to human rights, and we work with our customers to assist them in meeting their corporate social responsibility goals
- **Minimizing the impact of our operations on the environment:**
 - **We work** to reduce greenhouse gas emissions at our global offices and data centers
 - **We strive** to reduce waste to landfills and to recycle and re-use across our operations
 - **We are global headquartered** in a LEED-gold-certified building
- **Building bridges to our communities:**
 - **We support and participate** in local and global initiatives in the communities where we operate
 - **We offer team members** 16 paid hours annually they can use to support organizations and causes that matter most to them

See the [ESG Report](#) for more information about our Corporate Responsibility program and initiatives.

Anti-bribery and Corruption

NAVEX is committed to operating with integrity and doing the right things right in every aspect of our business.

We do not offer, pay or accept bribes, kickbacks or improper payments at any time for any reason, nor will we offer facilitation or "grease" payments.

- **Perform reasonable diligence** when selecting third parties to work on our behalf and follow our procurement processes
- **Keep accurate books and records** to ensure payments are not inadvertently used for unlawful purposes
- **If you are offered or asked for a bribe**, no matter how small, you must refuse it and immediately report the incident to legal or compliance

For further guidance, see our Anti-bribery and Corruption Policy or contact legal.

WHAT IF ...

An executive at a customer's company told me NAVEX must pay a special fee to an associate of theirs so we can do business in the country where they operate. What should I do?

Special payments made directly or indirectly to a customer, even if considered OK given local custom, could violate anti-bribery laws or regulations. Before making or agreeing to a payment of this kind, contact legal for guidance.



Fair Competition

We believe in free, fair and open competition.

We compete vigorously to be an industry leader and maintain high standards of fairness and honesty in our marketing, promotional and advertising activities.

We gain our competitive advantage through superior performance, value and quality, not through unethical or illegal business practices. We will not enter into any arrangement that is unlawful or would be inconsistent with our values.

Competition laws are complex, and compliance requirements can vary depending on the circumstances. Specific activities are “red flags” to be avoided and reported to legal or compliance:

- **Entering into anti-competitive agreements** with competitors, including price fixing, bid rigging, and market allocation or segmentation
- **Exchanging competitively sensitive information** with competitors. Be particularly careful at conferences and trade shows where we often spend time with our competitors in exhibit halls
- **Abusing a position** of market dominance
- **Meeting with competitors** where a questionable discussion begins. Make it clear that you believe the discussion is inappropriate, noticeably break away from the discussion and promptly inform legal or compliance



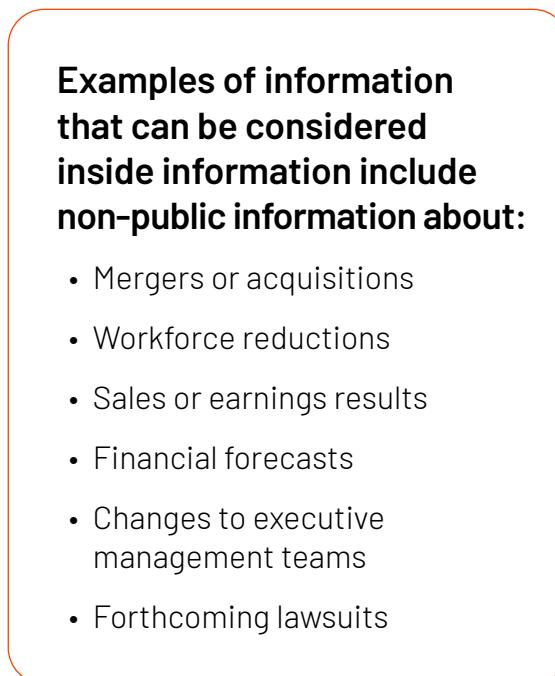
Insider Trading

While NAVEX is privately held, we conduct business with many publicly traded companies that trust us with their protected information.

In your role, you may become aware of information about customers, business partners or other companies that is not publicly available to ordinary investors. Using this "inside information" for personal gain or sharing it with others is contrary to our values and illegal.

Examples of information that can be considered inside information include non-public information about:

- Mergers or acquisitions
- Workforce reductions
- Sales or earnings results
- Financial forecasts
- Changes to executive management teams
- Forthcoming lawsuits



- **Never buy or sell, or encourage others to buy or sell**, securities of a company when you have inside information about that company
- **Remember:** These rules continue to apply even when you are no longer a NAVEX team member
- **If you have questions** or believe that inside information has been disclosed, contact legal or compliance

Political Activity

We encourage your personal participation in political activities, including running for and holding office, volunteering your time for a candidate or cause and making financial contributions.

Be sure to follow these guidelines so that your activities are not attributed to NAVEX.

- **Do not represent or leave the impression** that you are speaking or acting on NAVEX's behalf. Make it clear that your views, contributions and actions are your own
- **NAVEX funds, assets and resources**, such as offices, equipment and work time, may not be used for any political or lobbying activities without prior approval from the Board of Directors
- **Never pressure** other team members, customers or business partners to accept or support your political point of view
- **Political activities** can sometimes create a conflict of interest. Advance notice to our compliance team is required if you or your spouse intend to seek an elected office, accept a political appointment or suspect a conflict may arise from any political contribution



Global Trade Restrictions

Along with the privilege of being an industry leader with global reach comes a heightened obligation to comply with international laws governing trade.

Many governments restrict the import and export of services into and out of their countries and periodically place restrictions on conducting business with specific individuals and entities or in certain regions. NAVEX follows the laws and regulations that apply to the sale and provision of our services around the world.

If your role involves selling or implementing our services or transferring technology or data across international borders, keep in mind the following guidelines:

- **Sanctions are dynamic** and can change suddenly with shifts in the geo-political landscape. Consult with legal if you have questions whether a particular action you intend to take is impacted by sanctions.
- **Export control regulations** may impact or prohibit the international transfer of software, source code, technical data, customer data or technology. Ask legal for guidance if there is any question whether a transfer is permitted, particularly when the transfer is a departure from established company practices.
- **Don't participate in or promote boycotts** as a NAVEX team member. If you receive a request to do so, forward it to legal or compliance for review and guidance.



Acknowledgment

By certifying to our Code of Conduct, you are acknowledging that:

- **You have read and understand** our Code of Conduct
- **You agree** to abide by the principles of our Code of Conduct
- **You have had the opportunity** to ask questions about our Code of Conduct and understand how it relates to your role
- **You agree** to ask questions when you are not sure about the right course of action
- **You agree** that you will complete required training in a timely manner
- **You understand** you have a duty to promptly report to the company any suspected violations of our Code of Conduct, policies or the law
- **You agree** to cooperate in company investigations
- **You have access** to our Code of Conduct on [NAVEX One](#)



Resources

If you have questions about our Code or our policies or want to share a concern, there are resources available to help you.

COMPLIANCE

NAVEX4NAVEX.com

LEGAL

LegalNotice@NAVEX.com

HUMAN RESOURCES

HR@NAVEX.com

ANONYMOUS WEB REPORTING SYSTEM

NAVEX4NAVEX.com

MARKETING

Marketing@NAVEX.com

NAVEX may make changes to our Code of Conduct or company policies at any time.

NAVEX supports our team members' right to speak out publicly about matters of public concern or engage in certain activities related to the terms and conditions of their employment, including their right to organize and act collectively. Nothing in our Code of Conduct or policies is intended to limit or interfere with the right to engage in concerted protected activities, such as discussions related to wages, hours, working conditions, health hazards and safety issues.



A Closing Message From Our Chief Risk and Compliance Officer



One of the things I value most at NAVEX is that people feel safe to speak up. Whether it's a concern, a question or an idea, raising your hand here shows integrity, not risk. That kind of culture doesn't happen by accident. We build it together every time we make the right choice, even when it isn't the easy choice.

Every day, we face decisions that are not always written in a policy. In those moments, our values guide us.

Doing the Right Things Right, especially when it's difficult, defines our culture and protects our reputation.

Our Code of Conduct is here to help. It outlines expectations clearly, but it is your focus, judgment, courage and willingness to speak up that bring it to life. Each time you use the Code to guide your actions, you make NAVEX stronger. You also make it a better place to work.

If the Code doesn't answer your questions, we are here to guide you. Beyond compliance, I value the strong partnerships I have with our human resources and legal teams, who serve as essential allies in supporting team members, reinforcing accountability and sustaining our culture. They're here to support your questions or concerns, too.

I feel proud to serve as your Chief Risk and Compliance Officer because I see the way you live these values. You remind me that ethics isn't just something we promote, it's who we are. Thank you for continuing to build a workplace rooted in respect, accountability and integrity. Together, we make **NAVEX** a company we can all be proud of.

A handwritten signature in black ink that reads "Carrie Penman".

Carrie Penman

Chief Risk and Compliance Officer, NAVEX

