

NAVEX Group's 2026 Fiscal Year 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.

Assessment

We assess the risk of modern slavery across our operations and supply chain by considering characteristics of our service delivery model, including service type, involvement of contingent workers, and geographic location. Our assessment incorporates publicly available risk indices, internal procurement data, and supplier information.

Our Organisation

We consider the risk of modern slavery in 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.

We also mitigate the risk of modern slavery through employee education and an effective compliance program. 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 [Code of Conduct](#), 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. These reporting channels help in evaluating the effectiveness of our modern slavery controls.

Our Supply Chain

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 [Supplier Code of Conduct](#). 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. If we identify modern slavery in our supply chain, we are committed to appropriate investigation, remediation, and deterrence by issuing corrective action plans, enforcing contractual rights, or terminating the supplier.

Support for Other Organisations


As a service provider, 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, 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.

Looking Forward

We will remain committed to opposing modern slavery in our sphere of influence and will adapt our operations and procedures as necessary to do so, all while providing software tools to support similar efforts by thousands of our customers worldwide.

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


Andrew Bates (Mar 31, 2026 12:35:51 PDT) 03/31/2026
 CEO Dated: _____, 2026
 Andrew Bates
 Chief Executive Officer and Director