



Navanti Group Modern Slavery Statement For the year ending 31 December 2024

Navanti Group is committed to operating with the high ethical standards. This includes ensuring that our business respects human rights – a commitment reflected in our Employee Handbook, which is based on our Core Values – INTEGRITY, ETHICS, CUSTOMER FOCUS, and QUALITY. We recognize that slavery and human trafficking are grave violations of human rights and have no place in business operations or supply chains. We commit to combating modern slavery and human trafficking in all its forms.

Human rights are the most fundamental shared rights that we have, and Navanti Group joins the global community in promoting and protecting human rights and working to stop actions that infringe on these rights. We strive to run every part of our business with INTEGRITY, honesty, and transparency everywhere we operate. We do not allow modern slavery or human trafficking anywhere in our business. We uphold our standards of integrity in every situation by not allowing, asking, or enabling others to engage in prohibited conduct on our behalf. Furthermore, Navanti Group only conducts business with qualified third parties who commit to INTEGRITY and ETHICS consistent with ours.

Navanti Group is committed to ensuring that we identify and eliminate, to the fullest extent practicable, modern-day slavery or human trafficking in any aspect of our business. Our standards comply with all current national (in countries where we operate) and international laws, regulations, and codes to prevent trafficking and slavery in our business operations.

Structure

Navanti Group is headquartered in Arlington, Virginia, USA. It has operations across the globe, and a growing customer base around the world, including Nigeria, Germany, and the United Kingdom. We employ a highly educated permanent and part-time workforce and engage with independent contractors to drive our business and fulfill the needs of our customers. Although Navanti Group's main business is within professional services, we still practice strong INTEGRITY and ETHICS with our global supply chain protocols for the procurement of equipment, goods, and services from third parties, in addition to our engagement of strategic partnerships with external organizations.

All strategic partnership and procurement decisions fall to Navanti Group's management team, which includes our CEO, Controller, Chief of Staff, Operations Manager, and business sector leaders. The final decision for approval of third-party vendors and strategic partners must come from Navanti Group's CEO. To support our CEO, our dedicated leadership team fields requests from our workforce for third-party vendors and strategic partners identified for Navanti Group to conduct business with. Our management team executes a vetting process that covers all forms of risk against Navanti Group's rejection of modern slavery, our Child Labor Policy, our Countering Trafficking Corporate Compliance Plan and Policy, and Whistleblower Policy. Once thoroughly vetted for adherence to Navanti Group's values in human rights, we proceed with our approval process for third-party vendors and strategic partners; external entities are further vetted for IT security and compliance in line with Navanti Group's requirements and accounts payable processing compatibility and culminates in a final approval decision by the CEO.

Policies

Navanti Group is committed to ensuring that we do not tolerate modern slavery, child labor, or human trafficking in any part of our business or our supply chains. Our policies, our values, and our relationships with third parties underpin this commitment to respecting human rights. Our Code of Ethics defines our values at work and guides our behaviors. It requires our employees to interact with others ethically and properly and highlights our employment principles and other ethical standards. It specifically prohibits the use of modern slavery, child labor, or human trafficking in our business.



Whistleblower Policy

We have established a Whistleblower Policy to support our commitment to ethical practices and to combat modern slavery. This policy encourages and enables employees and third parties to report any concerns or suspicions regarding unethical or illegal activities, including any instances of modern slavery, human trafficking, or violations of our human rights standards. All reported concerns are taken seriously and investigated promptly. We ensure that there are no retaliatory actions against individuals who raise concerns in good faith.

Due Diligence

When assessing third parties, Navanti Group uses activity and geography-based factors to identify, assess, and document actions to mitigate risks to our human rights and labor principles. These factors determine which third-party engagements are deemed high-risk, requiring a deeper level of assessment. When necessary, third parties are required to answer specific questions about the policies, procedures, and controls they have in place to manage human rights and labor risks.

Training & Risk Awareness

All Navanti Group employees receive an annual Ethics training that explicitly raises awareness of the risks of slavery and human trafficking. The awareness training explains how to spot the signs of Modern Slavery, details the high-risk activities for the Company, and clarifies the internal escalation process for concerns related to this risk.

Measuring Effectiveness

For the reporting year ending 31 December 2023, there were zero recorded cases of human rights violations, including those related to trafficking or slavery, among the third parties surveyed. In addition to our risk management process, we continue to meet with our suppliers on a regular basis to ensure that they adhere to our ethical standards, drive innovation, and help us build a long-term competitive advantage.

Further Steps

Navanti Group will continue to review and improve its practices to identify and eliminate, to the fullest extent practicable, modern slavery or human trafficking from our business. This includes continuous improvement of our Third-Party Risk Management Framework. Additionally, we collaborate with stakeholders, including industry partners, NGOs, and government agencies, to share best practices, promote transparency, and drive collective action against modern slavery.

This statement is made pursuant to Section 54 of the United Kingdom of Great Britain and Northern Ireland's Modern Slavery Act of 2015. It constitutes Navanti Group's slavery and human trafficking statement for the financial year ending 31 December 2024. We are committed to continuously improving our efforts to combat modern slavery and human trafficking and to ensure compliance with all applicable laws and regulations.

Approval and Signature

Signed,

Fred Payne
Chief Executive Officer
01 AUGUST 2024