



NAVAN DIGITAL GROUP

ANTI-SLAVERY POLICY & STATEMENT

September 2021

Navan Digital Group – Anti-Slavery Policy & Statement

Statement on Modern Slavery and Human Trafficking

Navan Digital Group and its subsidiary companies ('NDG') are committed to social and environmental responsibility and to the fair and humane treatment of people in its employment and in its supply chains. This statement sets out the steps that Navan Digital Group will take during its inaugural year of operation, beginning on 1 October 2021 to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its own business.

Organisational structure and supply chains

Navan Digital Group is an international software engineering business. As such, NDG's own business operations and supply chain consists primarily of office-based professionals, with only very limited exposure to areas with a greater risk of modern slavery, for example, cleaning services, and travel and accommodation providers.

Policy

It is our belief that modern slavery and human trafficking are abhorrent practices that will not be tolerated in our own operations or in our supply chains, and we will take such steps that are reasonable to ensure that none is present. We are committed to working ethically and with integrity and we require our business partners to do the same.

Risk assessment and due diligence process

We will conduct an assessment of the risks, both external and internal, of slavery and human trafficking, including country risks, sector risks and business partnership risks within its own operations and in its supply chain and we have determined that none of our own business operations are undertaken in higher risk areas, whether by reference to geographical location or business sector.

Where or if we identify higher risk areas in our supply chains, appropriate due diligence will be undertaken to satisfy ourselves that the parties concerned have in place ethical employment practices that comply with all relevant legislation including, where applicable, the making of an Anti-Slavery statement pursuant to the Modern Slavery Act 2015. Where suppliers have not published an Anti-Slavery Statement, they will be required to confirm that they have in place such ethical employment practices and that they, in turn, require their suppliers to have the same.

Future steps

Throughout this inaugural year of our business operations, we will continue to monitor the risk of slavery and human trafficking in our supply chains and in own business, and we will act and report accordingly.

This statement is made pursuant to s.54 (1) of the Modern Slavery Act 2015 and constitutes Slavery and Human Trafficking statement will be reviewed, refined if or where necessary and will be authorised by the Board of Directors of Navan Digital Group at its Board meeting in December 2021, as part of the review of business operations for the inaugural quarter of business operations.