



Global Human Right Policy

At Navitas, we are committed to upholding and promoting human rights in all aspects of our operations. We recognize and respect the fundamental rights and dignity of all individuals, and we strive to ensure that our actions align with internationally recognized human rights standards such as the UN's Universal Declaration of Human Rights. This Human Rights Policy outlines our commitment to human rights and serves as a framework for our business practices.

Policy Scope

This Human Rights Policy applies to all aspects of Navitas operations, including our supply chain partners. The policy is designed to inform, establish guidelines, uphold standards, and demonstrate our unwavering commitment to global human rights as reflected in internationally recognized standards.

Labor and Human Rights

A. Working Hours, Wages and Benefits

We ensure that our employees receive wages that meet or exceed the minimum wage requirements set by law, including the legally stipulated overtime rate for hourly workers. Moreover, our employees are entitled to receive at least the legally mandated benefits, and they are not compelled to make any payments, deposits, or incur debts as a condition of employment. Unless in emergency or exceptional circumstances, we adhere to the maximum working hours prescribed by local regulations for our hourly employees. The decision to work overtime hours is entirely voluntary.

B. Freely Chosen Employment / Prevention of Human Trafficking and Forced Labor.

We forbid the use of forced, bonded (including debt bondage), indentured labor, involuntary or exploitative prison labor, slavery, or trafficking in our own operations and in those of our supply chain.

C. Prevention of Child Labor.

Navitas prohibits all forms of child labor. We employ individuals who are at least the legally mandated minimum age by the first day of employment based on the labor standards of local laws. Navitas and all business partners (including suppliers, vendors, and extended workforce) shall not engage or employ anyone who is under this child labor minimum age.

D. Non-Discrimination / Anti-Harassment.

We are committed to providing a work environment that is free of inappropriate and unlawful discrimination and harassment. We are committed to the fair and respectful treatment of all our workers, and we expect our suppliers to maintain the same commitment. We ensure that recruitment, hiring, training, promotions, disciplinary actions, and other employment decisions are made without consideration of race, color, ethnicity, religion, gender, sexual orientation, gender identity and expression, age, national origin, disability, veteran status, marital status, or any other protected classification as defined by the law. Furthermore, we provide reasonable accommodations for team members with disabilities or accommodating their religious beliefs and practices.

E. Freedom of Association.

We respect the right of our employees to associate without fear of pressure the rights of workers to freely associate and join trade unions of their own choice, engaging in collective bargaining and peaceful assembly as permitted by the relevant local laws. It is the right of workers to share ideas and concerns with management, free of fear of reprisal. In addition, all Navitas employees have a duty to speak up (through a variety of communication options, including anonymously) if they observe something that does not seem right, and we never tolerate reprisals or retribution against anyone who lodges a complaint or concern in good faith.

Ethics

A. Ethics and Code of Conduct.

Our business activities and transactions are conducted with the utmost integrity and adherence to ethical standards, in full compliance with all relevant laws. These principles are outlined in Navitas' Code of Business Conduct and Ethics, which guides our actions and decisions.

B. Anti-Corruption.

We abide by all anti-corruption laws everywhere we do business, including the U.S. Foreign Corrupt Practices Act (FCPA) and company-driven initiatives, including Board and Company committees, such as the Governance Committee and Compensation Committee, an Independent Audit Committee, and a Disclosure Committee. Officers, directors, employees, business partners and any other third party acting on our behalf are prohibited from dishonest, unethical or illegal business practices, including paying bribes or other prohibited payments to government officials and private individuals who interact with Navitas.

C. Protection of Identity and Non-Retaliation.

We ensure confidentiality, anonymity, and protection of employee and supplier whistleblowers, unless prohibited by law. We do not permit retaliation against our employees for good faith reporting of possible violations of our policies or the law. The reporting tools we have established are identified in Navitas' Code of Business Conduct and Ethics.

D. Privacy.

We take measures to protect the personal and confidential information of our employees, customers, suppliers, and other appropriate persons. We have a global privacy policy concerning our collection, use, disclosure, and retention of personal information.

Health and Safety

We are committed to the protection of the environment, including pollution prevention, and providing an incident and injury-free workplace for our team members, contractors, and visitors.

Suppliers and Third Parties

We ensure that our suppliers are well-informed about the principles outlined in our Supplier Code of Conduct, the RBA Code of Conduct, and our Global Human Rights Policy through our Supplier Management Procedure and Audit process. We set the expectation that our suppliers will uphold compliance with all relevant laws regarding their employment practices, health and safety measures, and ethical conduct.

This Global Human Rights Policy is reviewed periodically and updated as necessary.