



Values in Action

OUR COMMITMENTS AND EXPECTATIONS

Defining the Navitas way

Values in Action symbolises what we stand for as an organisation.

Every day we have the opportunity to improve people's lives through education. This is a genuine privilege.

Our decisions and actions shape our organisation's reputation and future success. We owe it to those who rely on us to conduct ourselves with the highest ethical standards, comply with laws and regulations, and maintain a work environment consistent with our values.

We succeed by continuing to build trust and respect for each other, as well as our students, partners and shareholders.

Values in Action is a framework for how we conduct ourselves, no matter where we work globally. It provides guidance to help us make the right decisions and advice on what to do if we witness behaviour that does not reflect our **Values in Action**.

We require you, our employees, to act with integrity, follow the law and report any wrongdoings to your manager, another manager or HR Business Partner. We also have systems in place to support, protect and encourage employees to report non-compliant, illegal or unethical conduct. Please see the SPEAKING UP section in this document.

We should all take pride in our organisation that strives for the highest standards of ethical behaviour, and is guided by strong values at its heart; to provide life-changing opportunities to learn.



Our Vision, Purpose and Values

VALUES IN ACTION DRAWS ON OUR SHARED **VISION, PURPOSE AND VALUES.**

OUR VISION IS TO BE THE BEST GLOBAL EDUCATION PROVIDER IN THE WORLD FOR OUR STUDENTS, PARTNERS AND PEOPLE.

OUR PURPOSE IS TRANSFORMING LIVES THROUGH EDUCATION. WE ARE PASSIONATE ABOUT LEARNER OUTCOMES, CREATING EMPLOYMENT OPPORTUNITIES THROUGH LIFELONG LEARNING, AND BEING A GLOBAL LEADER IN DELIVERING BETTER LEARNING SOLUTIONS.

OUR VALUES:



We demonstrate **DRIVE** by achieving and advancing together



We are **ADVENTUROUS** in mind and spirit



We have **CONVICTION** to our purpose and potential



We are **GENUINE** in the way we behave and deliver



We demonstrate **RIGOUR** in enhancing our professional reputation and credibility



We show **RESPECT** by celebrating, valuing and caring for people and the environment

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Values in Action:

The way we conduct ourselves

Values in Action outlines a set of commitments and expectations that apply to everything we do at Navitas. It is the guiding framework for the behaviour of our people.

We live the Navitas values through the behaviours we demonstrate in the conduct of our work.

Navitas is bound by legislation and agreements that ensure our operations across the globe are ethical, appropriate, effective and compliant. To better understand specific compliance, please refer to your local policies and procedures.

OUR PEOPLE

Navitas is committed to treating all our people with respect, dignity, courtesy, honesty and fairness, and with the proper regard for the rights, safety and welfare of all. We strive to make decisions fairly, impartially and promptly, while observing all relevant information, legislation, policies and procedures.

We commit to encouraging positive work habits and professional workplace relationships and boundaries.

Our expectations of you

- To treat others with respect, dignity, courtesy, honesty and fairness
- To contribute to a workplace environment free of harassment, bullying or discrimination
- To not engage in behaviour that may bring your personal reputation or that of the organisation into disrepute
- To not tolerate or participate in behaviour that is inconsistent with the Navitas values

OUR STUDENTS

Navitas is committed to maintaining an environment and culture that enables us to care about our students. We are committed to providing a consistently high standard of service delivery within fully operational facilities.

Our expectations of you

- To treat students honestly and fairly, with proper regard for their rights and obligations
- To provide accurate information to students about visa requirements
- To communicate honestly with students about their options, performance and progress
- To offer the highest standards of teaching and learning

NOTE: We do not provide migration advice to either students or prospective students.

OUR UNIVERSITY PARTNERS AND AGENTS

Navitas is committed to complying with all applicable policies and procedures of our University Partners and Agents. We commit to open, timely communication with University Partners and Agents.

Our expectations of you

- To be responsive and courteous in all dealings with staff, students, clients and visitors from our partner universities
- To ensure our Agents always act in the best interests of Navitas and the students with whom they interact

OUR SHAREHOLDERS

Navitas is committed to fulfilling our duty to making full, fair and timely disclosure of relevant information to shareholders.

We value communication with our shareholders, other stakeholders and the public at large. The Board is committed to delivering value for shareholders and exerting its best efforts to maximise shareholder benefits.

Our expectations of you

- To generate positive relationships with our shareholders and respond to shareholder enquiries and requests in a timely manner



Values in Action: Conduct guidelines

ALCOHOL AND ILLEGAL DRUGS

Navitas is committed to providing a work environment for our staff and students that is free from both the use of illegal drugs and the misuse of alcohol.

A manager may request an alcohol and/or drug screening if he/she has reasonable suspicion that an employee's use of drugs and/or alcohol is adversely affecting their job performance or the safety of the employee or others in the workplace.

A reasonable suspicion may be based on objective observations of an employee's appearance, behaviour or speech.

Our expectations of you

- Not to be under the influence of alcohol or drugs, or use alcohol or illegal drugs while doing your work
- To be fit and well enough to do your job
- To behave in an appropriate and acceptable manner at all Navitas-related functions and events

BRIBERY AND CORRUPTION

Navitas is committed to never becoming involved in bribery or corruption of any form, regardless of location, situation or association.

Our expectations of you

- To not give or receive something of value in exchange for some kind of influence or action in return, that the recipient would otherwise not offer
- To not engage in dishonest or illegal conduct
- To not engage in conduct that is detrimental to any person or entity
- To not misuse your position to your own advantage or that of others
- To comply with the Gift and Benefit Acceptance Policy
- To comply with the Anti-Bribery and Corruption Policy
- To make payments for business purposes only
- To make payments within the set limits of the organisation and where there is proper and written documentation; for example, a contract, invoice, purchase order, or receipt.

COMPLIANCE

Navitas is committed to complying with all relevant laws and regulations in every country of operation.

Our expectations of you

- To act in accordance with the law and all other regulations of the region in which you operate, at all times

- To act in accordance with this **Values in Action** document at all times
- To enter into a written agreement to formally document the organisation/employee relationship
- To disclose previous or pending sanctions, fines or decisions imposed on you that may impact your work at Navitas

CONFLICT OF INTEREST

Navitas is committed to appropriate and effective disclosure and management practices to ensure that an individual's personal activities and interests do not conflict with their responsibilities at Navitas.

Our expectations of you

- To use good judgement and avoid any conflict of interest, or potential conflict of interest
- To verify that your personal, financial or political interests, and those of your family or associates, do not conflict with, or influence, your professional obligations
- To appropriately disclose any actual, potential or perceived conflict of interest
- To properly manage any actual, potential or perceived conflict of interest

NOTE: You may serve as an officer or member of a board for a not-for-profit organisation with prior written approval from your Regional HR Director. Approval must be sought annually.

DIVERSITY AND INCLUSION

Navitas is committed to providing all employees with a fair, respectful and inclusive working environment. We respect and value the diversity of our employees and are committed to actively supporting and encouraging a diverse workforce and inclusive workplace.

Our expectations of you

- To understand and appreciate the value of diversity
- To treat everyone with respect, dignity, courtesy, honesty and fairness
- Not to engage in any form of discriminatory behaviour

ENVIRONMENT

Navitas is committed to protecting the environments in which we operate, to minimising waste and to seeking sustainable energy solutions wherever possible.

Our expectations of you

- To minimise the use of raw materials
- To keep waste to a minimum
- To recycle packaging and other materials wherever possible
- To use water and energy efficiently
- To consider whether travel is necessary

FAIR COMPETITION

Navitas is committed to competing ethically and lawfully in our operations and activities and to staying abreast of the competition landscape.

Our expectations of you

- To make business decisions that are in the best interests of the organisation and completely free from any undue or improper influence, collusion or arrangement with any third party or competitor

INTELLECTUAL PROPERTY

Navitas is committed to protecting our intellectual property and respecting that of others to maintain our competitive advantage.

Our expectations of you

- To protect the organisation's intellectual property (copyright, trademarks and trade secrets) from unauthorised use
- Not to use the intellectual property of others without prior authorisation

LEARNING AND DEVELOPMENT

Navitas is committed to providing employees with opportunities to further their knowledge and develop their skills to help them reach their full potential.

Our expectations of you

- Embrace a culture of learning by actively seeking self-improvement to improve role and organisational capability
- Complete all onboarding and offboarding requirements and mandatory training in a timely manner

PROPERTY AND RECORDS OF THE ORGANISATION

Navitas is committed to using company property, and financial and electronic resources for the sole purpose of conducting the business of the organisation, and not for any form of personal gain or non-authorised use.

Our expectations of you

- Never to obtain, use or divert the organisation's property or financial resources for personal use or benefit, or for any activity that causes, or could potentially cause, a conflict of interest
- To maintain accurate business and financial records such as financial accounts, quality reports, time records, expense reports and submissions
- To ensure appropriate secure storage of the organisation's records

PROTECTING INFORMATION PRIVACY AND CONFIDENTIALITY

Navitas is committed to protecting personal information. We commit to compliance with all laws in the collection, use, and protection of all personal information in connection with our organisation.

We commit to protecting our shareholders and ourselves by responsibly managing our own confidential information and that of any third party.

Our expectations of you

- To actively prevent any unauthorised access to information that is personal or confidential
- To adhere to all relevant data protection obligations
- To take particular care where, and to whom, we discuss confidential information
- To ensure the secure storage of confidential and personal information in the workplace and elsewhere
- To complete mandatory Information Security training when required
- To protect the organisation's non-public information outside of the workplace and working hours, and after cessation of employment

REPUTATION AND COMMUNICATION

Navitas is committed to upholding the reputation of the organisation at all times and in all forms of internal and external communication. We are committed to building trust and respect by communicating openly and honestly with our employees, partners, students and shareholders.

We commit to ensuring those employees who use social media platforms as part of their role, or in a personal capacity, are provided clear and appropriate guidance concerning the organisation's expectations.

Our expectations of you

- To always consider the reputation of Navitas when communicating in person, in writing and online (including social media)
- To accurately share information about our operations and financial performance when authorised to do so
- To use plain, non-discriminatory language in all forms of communication

SAFETY AND HEALTH

Navitas is committed to providing healthy and secure work environments, with the goal of ensuring all employees complete each working day as safely as possible.

Our expectations of you

- To actively care for your health and safety
- To look out for the health and safety of others
- To intervene when you notice a colleague or student placing their health and safety, or that of others, at risk
- To report any hazards or safety concerns at Navitas premises
- To report any health and safety incidents that occur on Navitas premises or whilst the individual is travelling for Navitas business



Making Sound Decisions

By understanding and meeting the expectations laid out in this **Values in Action** document, and complying with our legal obligations, we have a solid foundation on which to make decisions in the best interests of all.

Policy HUB is the home for all Navitas policies and policy-related documents. Our policies establish a culture of awareness and compliance by providing you with vital information to help make good decisions. You can access Policy HUB via the Navitas Intranet.

The following is a list of policies that relate to **Values in Action**:

- Anti-Bribery and Corruption Policy
- Anti-Discrimination and the Prevention of Harassment Vilification and Bullying Policy
- Diversity Policy
- Drug and Alcohol Policy
- Grievance Management Policy
- Gift and Benefit Acceptance Policy
- IT Acceptable Use Policy
- Records Management, Retention and Disposal Policy
- Whistleblowing Policy

Additional related procedures and process documents can also be found on the Hub

If you are unsure whether a decision you are making, or something you have been asked to do, might be contrary to our **Values in Action**, it may help to ask yourself the following questions:

- Is it legal?
- Does it comply with the values of Navitas?
- Is it fair?
- Does it feel right?
- How would other people in the organisation react?
- What would happen if everybody did this?
- Can I discuss this freely with my manager?
- How would it look if it was made public?

If you are uncomfortable with any of the answers to these questions, you should seek advice before acting. Please see the **SPEAKING UP** section of this document for further information about reporting conduct that does not reflect our **Values in Action**.

In the face of a dilemma, managers play an especially important role in making decisions and assisting others to determine the most appropriate course of action.

Our expectations of our managers

- To ensure the people you supervise understand their responsibilities under this **Values in Action** document
- To create opportunities to discuss **Values in Action** and reinforce the importance of ethical behaviour and compliance with employees
- To create an environment where all employees feel comfortable raising concerns without fear of retaliation
- To always act to prevent illegal or dishonest conduct of those you supervise
- To always act to prevent any breach of this **Values in Action** document or Navitas Policy by those you supervise

If an employee breaks the law, or fails to comply with **Values in Action**, or any Navitas policy, they may face disciplinary action.

Speaking Up

You have a responsibility to speak up if you witness behaviour that does not reflect our **Values in Action** or might be breaking the law. Advice can be sought from your manager, another manager or your HR Business Partner.

To support, protect and encourage employees to report non-compliant, illegal or unethical conduct, Navitas has a Whistle-blower service. The **Speak Up through Whispli** portal is available to all Navitas employees and can be accessed via the Navitas intranet 24 hours a day, seven days a week.

You may choose to remain anonymous, although you are encouraged to identify yourself to facilitate communication. To help maintain confidentiality, please do not discuss the issue, or any pending investigation with other employees.

Navitas prohibits retaliation against any employee/ stakeholder who reports or participates in an investigation of a possible violation of our policies or the law. If you believe you are being retaliated against, please contact Human Resources.



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