



Values in Action
Our Code of Conduct





Acknowledgement of Country

Navitas acknowledges the Traditional Owners of the land in Australia and respects all First Nations peoples in the countries in which we operate.

We recognise and respect the continuing living cultures of First Nations peoples throughout the world, and recognise their connections to lands, seas, waterways, sky and Community. We pay our respects to Elders past and present.

Artwork by Whadjuk, Ballardong and Yamatji Aboriginal Woman Marcia McGuire.

DEFINING THE NAVITAS WAY

A message from our CEO

Values in Action symbolises what we stand for as an organisation and defines the behaviours that drive our purpose of transforming lives through education. To be able to deliver on this purpose is a genuine privilege, and something we have been committed to for over 30 years.

Our success has been built on the back of the trusting and respectful relationships we have established with our university partners, agents, students and each other.

Values in Action is a framework for how we conduct ourselves, regardless of where we work globally or the role that we have. I expect my leadership teams to set the example that others follow, and I hold myself to the same high standards.

Our decisions and actions protect our reputation and shape our 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 safe learning and working environments that reflect our values.

Values in Action is fundamentally about Respect – behaving in a respectful way towards each other, our students and partners. It is also about making good decisions and supporting others to do the same. And just as importantly, it is about calling out behaviour or decisions that do not align with our values. We have systems in place to support, protect and encourage employees to report non-compliant, illegal or unethical conduct. Please see page 9 in this document for guidance.

I hope Values in Action inspires the same pride and commitment in you that it does for me. I am proud to work for an 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.

Scott Jones

Group CEO, Navitas Pty Ltd



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.

In achieving our vision and purpose, we are guided by a strong set of **values**:

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



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



We are **ADVENTUROUS** in mind and spirit

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



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



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 all Navitas staff and everything we do at Navitas. It is the guiding framework to ensure that our behaviour reflects our values.

Our value of 'respect' is at the heart of the way we interact with each other, our students, and the organisations we work with.

Respect for each other

We are 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 applicable laws, policies and procedures.

We commit to encouraging positive work environments where every employee feels safe, respected and valued.

Our expectations of you

- To always demonstrate the Navitas values
- To treat others with respect, dignity, courtesy, honesty and fairness
- To contribute to a workplace of inclusion and an environment free of harassment, bullying or discrimination
- To look out for each other's safety and wellbeing
- Not to engage in behaviour that may bring your personal reputation or that of the organisation into disrepute.

Respect for our students

We are committed to maintaining an environment and culture that enables us to care for our students; and providing a consistently positive student experience.

Our expectations of you

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

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





Respect for our university partners and agents

We are committed to demonstrating our values when working with university partners, agents, suppliers and other third-party organisations.

We commit to open, timely communication with all our partners including universities, agents, suppliers and investors.

Our expectations of you

- To be respectful towards all stakeholders from the organisations we work with
- To ensure the organisations we work with are aware of our expectations around ethical conduct
- To identify and escalate any activity or behaviour by a partner organisation that does not meet our own expectations around ethical conduct
- To comply with our partners' policies and procedures where appropriate

Respect for laws and regulations

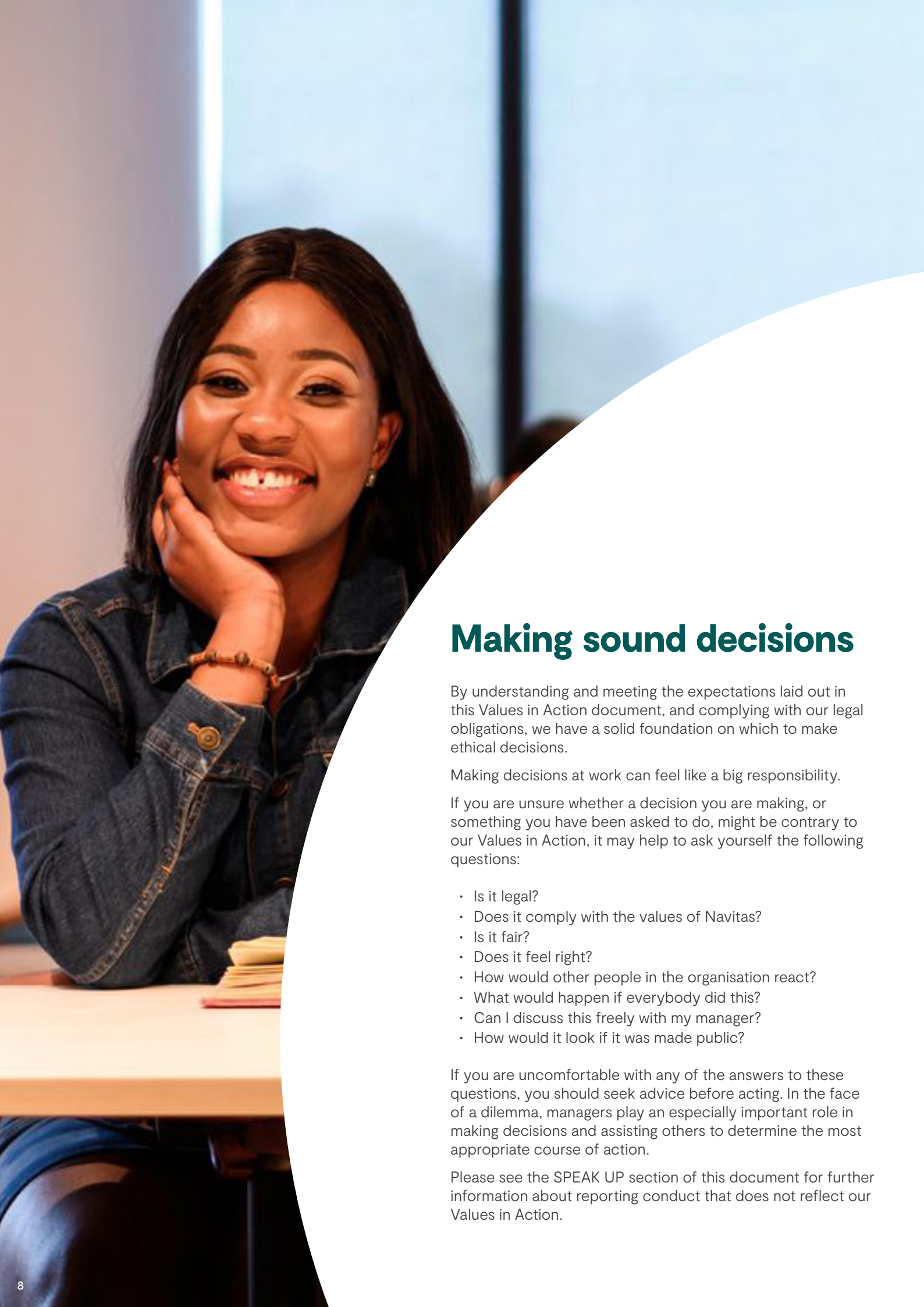
We are committed to meeting our obligations under applicable laws, regulations and agreements with our partners.

As a global organisation we are bound by laws and regulations that are specific to the different countries in which we operate.

Our expectations of you:

- Seek to understand the relevant laws, regulations and legal agreements relevant to your role
- Complete all associated training provided to you
- Ensure you are familiar with relevant local policies and procedures

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



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 ethical decisions.

Making decisions at work can feel like a big responsibility.

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. 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.

Please see the SPEAK UP section of this document for further information about reporting conduct that does not reflect our Values in Action.

Raising concerns

Navitas is committed to ensuring that you can raise concerns in good faith without fear of reprisal.

We acknowledge that raising concerns around potentially unacceptable or inappropriate behaviour takes courage and integrity and we are committed to creating a culture where you feel safe raising concerns.

If you have concerns:

1. Arrange a time to speak to your manager. Outline the details of your concerns in a professional manner.
2. If the matter relates to the safety or wellbeing of yourself or others, we would also encourage you to register the matter in our Wellness, Health & Safety system (DoneSafe).
3. If you do not feel comfortable speaking to your manager, consider another colleague such as an HR manager or a senior leader within your team or business unit.
4. If you feel these conversations do not resolve your concerns, or you feel unable to talk to someone in person, or you require anonymity, we encourage you to use the Speak Up through Whispli portal.

SPEAK UP though WHISPLI

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, students, visitors, partners and agents. It can be accessed via the Navitas intranet and website 24 hours a day, seven days a week. Using this platform means that you can remain anonymous, and we are still able to communicate with you. Identifying yourself is encouraged and sometimes it is important so we can get to the bottom of matters but it is not compulsory. To help us 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.



DoneSafe



SpeakUp
through
Whispli

Leading by example

We place a great deal of trust in our people around the world to represent our Company and Values. Our leaders and managers play an important role in setting a high standard for teams to follow and creating a culture that facilitates open discussion and reflection.

Our expectations of leaders and managers:

- Ensure the people you supervise are aware of the Navitas values and seek to exemplify them
- Ensure the people you supervise understand their responsibilities, as outlined in this code of conduct
- Create opportunities to discuss Values in Action and reinforce the importance of ethical behaviour and compliance with employees
- Promote an environment where all employees feel they can do their best work, suggest improvements, and raise concerns without fear of retaliation
- Act to prevent illegal or dishonest conduct of those you supervise and work with
- Role model and act to prevent any breach of this Values in Action document or Navitas Policies

Addressing concerns

We expect our leaders and managers to foster a culture that empowers colleagues to speak up if they have concerns, so it is really important that you respond appropriately if your team members bring a concern to you.

If team members or other colleagues have concerns, it is important that our managers:

- Make time for them so that you can give the concern your full attention
- Listen attentively and ask questions
- Do not feel pressured to provide an immediate response or solution, but commit to following up
- Ascertain whether the information shared is confidential
- Thank your team member for coming forward
- Seek whatever support you feel you need whilst being respectful of the needs and wishes of the people involved. This support could be your manager, HR or WHS representative.
- Aware of and comply with Navitas' Immediate Incident Escalation and Reporting Policy



SPECIFIC CONDUCT GUIDELINES

Contributing to positive working environments

Acceptable use of technology

Navitas is committed to providing staff members with the technology required to carry out your duties; and to provide support services to ensure that the technology is maintained.

Our expectations of you:

- To use IT systems, services, platforms and equipment in a respectful and professional way
- To comply with all relevant policies, legislation or regulations when using IT systems, services or equipment
- To take responsibility for any activity that is performed under your username
- To only input personal data of staff and students onto Navitas IT systems approved for that purpose
- Not to use Navitas IT systems, services or equipment for the purposes of gaming, gambling, political activity, harassment, share trading or any form of personal financial gain (see the IT acceptable use policy for a comprehensive list)

Alcohol and illegal drugs

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

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.

Learning and development

We are committed to supporting employees to reach your full potential by providing opportunities to expand your knowledge and develop your skills. We will also provide appropriate training to ensure that you have the information required to meet our compliance and legal obligations.

Our expectations of you

- Embrace a culture of learning by actively seeking self-improvement and proactively keeping your professional skills and knowledge up to date.
- Complete all onboarding and offboarding requirements and mandatory training in a timely manner
- Apply your new skills and knowledge in the workplace to improve job performance
- Approach new technologies, processes and opportunities with curiosity and a continuous improvement mindset
- Participate in interpersonal and team learning, sharing skills and knowledge with others
- Actively engage in development planning and feedback, using it as an opportunity to grow

Diversity, Equity And Inclusion

We are committed to providing all employees with a fair, respectful and inclusive working environment. We want to harness the diversity at every level of our organisation so that we can create a better tomorrow. We are committed to supporting and encouraging an inclusive environment where everyone can feel valued and has a sense of belonging.

Our expectations of you

- To promote a supportive, inclusive and welcoming environment, valuing and encouraging the respectful contribution of others
- To treat everyone with respect, dignity, courtesy and fairness
- Not to engage in any form of discriminatory behaviour
- To always use respectful language, speak plainly and avoid terms that may not translate across cultures
- To educate yourself about, and be respectful of, the many elements of diversity and the impacts of discrimination
- To address discriminatory or disrespectful behaviour when you witness it, and report it when necessary

Appropriate relationships

We are committed to ensuring a respectful, trusting and productive working and learning environment. This includes providing clear expectations for staff around workplace relationships. Navitas prohibits relationships of an intimate nature between staff members and students for whom the staff member has responsibility.

Navitas also has clear expectations around workplace relationships, and managing conflicts of interest promptly and effectively.

Our expectations of you:

- To maintain professional boundaries and ensure appropriate interactions with colleagues and students at all times.
- To comply with the Workplace Relationship Policy and the Staff-Student Relationship Policy
- To disclose any close personal relationship or family relationship in accordance with the above policies

Delivering for our students

Sexual Harassment

Navitas believes that every individual has the right to work and learn in an environment that is free from discrimination and harassment, including sexual harassment.

Our expectations of you

- To adhere to all Navitas policies related to preventing and addressing harassment or discrimination
- To complete regular training so that you are able to identify what it is, its impact and appropriate ways to respond
- To model respectful and professional behaviour at all times, setting positive examples for students and colleagues
- To intervene in situations when it is safe to do so and thereby helping to stop incidents from occurring
- To report any incident you experience, or become aware of, through the appropriate channels

Wellness, Health & Safety

We are committed to providing safe and healthy working environments for all colleagues, students and visitors to our colleges, campuses and offices

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 provided it is safe to do so
- To promptly report any hazards or safety concerns at Navitas premises
- To report any health and safety incidents that occur on Navitas premises, during the course of your employment or whilst an individual is travelling for Navitas business

Academic integrity

We are committed to ensuring appropriate governance structures are in place in all our colleges and campuses to maintain the highest standards of academic integrity. We will work with our university and industry partners, and regulators, to respond to issues impacting academic integrity (such as contract cheating or misuse of AI), and improve our policies and procedures when required.

Our expectations of you:

- To always demonstrate high standards of academic integrity and ethical academic conduct
- To comply with the policies and procedures of Navitas, your college/ campus, and our university partners
- To report suspected academic integrity breaches through established procedures (including university partner channels as appropriate)
- To provide students with timely, fair and constructive assessment of their work
- To address student concerns and complaints promptly
- To acknowledge students' intellectual property rights

Compliance with education regulations

We are committed to meeting the standards set by the governments and regulators in all the countries in which we operate. From an educational perspective this means complying with various frameworks such as the Higher Education Standards Framework (Australia) and the UK Quality Code for Education.

Our expectations of you:

- To act in accordance with the relevant regulations at all times
- To raise concerns if you are aware of activity that puts us in breach of relevant regulations

Management of student data

We are committed to effectively managing student data (including Personal Identifiable Information) through appropriate policies, procedures and processes and robust security measures.

Our expectations of you:

- To treat all student data with due care and respect
- To ensure student data you collect is accurate and reliable
- To prevent unauthorised access to student records
- To respect the rights of students to access or permanently delete their student data except where we are required by law to retain that data
- To use student data wisely to evaluate student performance and teaching effectiveness, and to identify patterns and trends that may lead to improvements to student outcomes
- To comply with applicable laws and regulations regarding the use, management and storage of personal information

Ethical business practice

Bribery and corruption

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

Our expectations of you

- Not to give or receive something of value in exchange for some kind of influence or action in return, that the recipient would otherwise not offer
- Not to engage in dishonest or illegal conduct
- Not to engage in conduct that is detrimental to any person or entity
- Not to 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, Fraud and Money Laundering Prevention 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 with laws and regulations

We are committed to complying with the applicable laws and regulations in each country we operate in.

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 disclose previous or pending sanctions, fines or decisions imposed on you that may impact your work at Navitas or Navitas' or its partners' reputation

Conflict of interest

We are 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 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 HR Director. Approval must be sought annually.

Environment and sustainability

We are committed to protecting the environments in which we operate, to minimising waste and to measuring and reducing our carbon emissions.

Our expectations of you

- To minimise the use of raw materials
- To keep waste to a minimum and to recycle waste and other materials wherever possible
- To use water and energy efficiently
- To consider sustainability implications when purchasing goods and services
- To avoid unnecessary business travel and consider the environmental impact of business travel arrangements

Fair competition

We are 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 Navitas free from any undue influence
- To not collude or engage in any unlawful arrangement (e.g. price fixing, market sharing or bid rigging) with any third party or competitor

Intellectual property

We are 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

Modern Slavery

We are committed to identifying and mitigating modern slavery and human trafficking risks within our operations as outlined in our Modern Slavery Statement.

Examples of modern slavery include human trafficking, domestic servitude, debt bondage, forced labour, forced marriage and other slavery-like practices.

Our expectations of you:

- To comply with requests to complete Modern Slavery training
- To understand the modern slavery risks associated with your part of our organisation
- To remain vigilant to the possibility of modern slavery and to report any suspicious activity through the DoneSafe tool or the Speak Up whistleblowing platform
- To ensure suppliers, agents and partners meet our standards around Modern Slavery as specified in our supplier, agent and partner agreements

Property and Records of the Organisation

We are 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-authorized 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

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

We commit to protecting our employees, students, partners and organisations we work with 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
- Take particular care where, and to whom, we discuss confidential information
- Ensure the secure storage of confidential and personal information in the workplace and elsewhere
- To complete mandatory Information Security and Data Privacy 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

We are committed to protecting and strengthening our reputation 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, respectful, non-discriminatory language in all forms of communication.



Supporting policies and further resources

Sitting behind the commitments and expectations set out in this Values in Action code of conduct is a comprehensive set of policies and procedures.

The following is a list of policies that relate to Values in Action. These include:

- Anti-bribery and Corruption, Fraud and Money Laundering Prevention Policy
- Anti-Discrimination and the Prevention of Harassment Vilification and Bullying Policy
- Delegations of Authority
- Disciplinary Policy
- Environment Social Governance (ESG) Policy
- Grievance Management Policy
- Gift and Benefit Acceptance Policy
- Global Diversity, Equity & Inclusion Policy
- Global GDPR & Privacy Policy
- Global Privacy Training and Awareness Policy
- IT Acceptable Use Policy
- Media, Social Media and Speaking Policy
- Records Management, Retention and Disposal Policy
- Staff-Student Relationships Policy
- Whistleblowing Policy
- Workplace Relationships Policy

Local policies may have different names but cover the same or similar content. A full library is available in **Policy HUB**, where you can filter by your division.







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