



NAVEX[®]GLOBAL[®]
The Ethics and Compliance Experts

WORKPLACE PRACTICES

USA Guide

Our Core Values



A Message from Our Leadership Team

Our Workplace Practices, combined with our Code of Conduct and Total Rewards Programs, are designed with the goal of being simple to follow and relevant to the experience we believe each team member deserves at NAVEX Global. We take pride in how we treat each other and the extra care we extend when faced with challenges and pressure to perform.

Upholding our Code of Conduct and Workplace Practices is key to your personal success and our ability to achieve our organizational goals. You were hired because of your strong talents and ability to contribute to a positive workplace. In the end, what you do matters, including how you go about doing your work and the experience you help create for yourself and your colleagues; we are confident you will do the right things right!

If you have questions about the following Workplace Practices or our Code of Conduct, please contact your manager or Human Resources. Choosing to not uphold our Code of Conduct or Workplace Practices may result in your employment with NAVEX Global being terminated.

Thank you for your commitment to upholding our Code of Conduct and Workplace Practices.

NAVEX Global's Leadership Team

Disclaimer:

NAVEX Global's workplace practices and Code of Conduct are not intended to create contractual obligations for the Company. Our Code of Conduct and Workplace Practices may be modified from time to time without notice. Employment at NAVEX Global is on an "at will" basis, which means that either you, the employee, or NAVEX Global may terminate the employment relationship at any time, for any reason, with or without cause.

Accessing My Personnel File

NAVEX Global maintains a personnel file for each team member that includes information such as your job application, resume, records of training, documentation of performance, salary history and other information related to your employment. Any information related to your medical benefits and/or medical needs are kept in a separate file per HIPAA regulations.

You are personally welcome to contact a member of our Human Resources Team to review and/or request a copy of your personnel file at any time. Beyond you, access to your file is restricted and considered highly confidential. Typically only management team members of NAVEX Global who have a legitimate reason to review your file are allowed to do so. In some specific instances NAVEX Global may be required to share your file with people outside NAVEX Global; such instances include:

- » In response to a subpoena, court order, or order of an administrative agency.
- » In a lawsuit, grievance, or arbitration in which you and NAVEX Global are parties.
- » To administer employee benefit plans.
- » To a prospective employer or other person requesting a verification of your employment, but only if you give us a written release to do so. Otherwise, NAVEX Global will provide only the dates of your employment, your last or present job title, and the status of your employment.



Achieving Success at NAVEX Global

Coaching

NAVEX Global is committed to developing employees and sees ongoing coaching conversations with your manager as key to your success. Coaching sessions may not always be driven by your manager and in fact, you should exercise accountability for your success by initiating conversations as beneficial to your development.

Example: Proactively invite feedback on how you handled a meeting, call or project – not just from your manager, but from your peers. Be prepared to hear candid feedback and recognize the way you may have been experienced you could be different than you intended.

Your First 90 Days

NAVEX Global recognizes your first 90 days is a critical time to learn about your role and develop relationships with your team and manager; it is also an opportunity for you and NAVEX Global to establish key expectations to support your future success.

During your first 90 days, you should ensure you are getting the support and information you need to meet and exceed expectations at NAVEX Global by asking questions, prioritizing review of training materials provided and sharing feedback with your manager on additional tools or resources you may need to deliver results. Your manager will discuss your progress with you to ensure you are tracking as expected for successful results.

Objectives and Key Results (OKRs)

“Own It!” is one of NAVEX Global’s core values and serves as the platform for each of us to achieve not only our business goals, but our overall personal career ambitions.

As a NAVEX Global team member, you are ultimately accountable for your personal success. Because NAVEX Global is one of the fastest growing organizations within the ethics and compliance space, you also have the potential to experience opportunities that you may not otherwise be able to in your career.

OKRs will create unity across our entire team, create the framework for you to be successful at NAVEX Global and ensure what you do matters. For questions about establishing your OKRs, please see your manager.

Absent From or Late to Work

Each day your team and NAVEX Global depend on you “being there.” NAVEX Global also recognizes there will be days where you are not always able to arrive to work as scheduled. Should you be faced with a late arrival or inability to arrive to work as scheduled, you should communicate with your manager as soon as possible by contacting them directly and leaving a message on their voice mail in the event he/she is unavailable. You should not plan on leaving a message with another colleague in absence of your manager unless prior arrangements have been made with your manager. Given the significance of your role at NAVEX Global, excessive tardiness and unplanned attendance not protected by law may lead to disciplinary action, up to and including termination of employment.

Contact Center Attendance Policy for Non Exempt Professionals

The role you play on behalf of NAVEX Global as a Contact Center team member is key to our overall success and highly valued. As an organization, we are committed to sustaining the highest level of service to each of our clients and without you, we will not achieve our goals!

Your regular attendance and punctuality is an important part of our efforts to provide high levels of service and satisfaction to our callers and clients. Regular attendance and punctuality also shows respect toward your colleagues by ensuring additional work is not created because of your unplanned absence or delay to work.

If you are a team member working in the State of Oregon, please review the attendance policy for this specific location located within the Policy Management system.

We are also committed to caring for each of our team members and recognize that time away from your role at NAVEX Global is important and necessary to support other priorities in your life. Through our PTO and holiday programs, you may schedule time for your personal needs by providing a minimum of 48 hours’ notice and receiving approval from our Workforce Management tool. Please review the PTO and Holiday Schedule programs to learn more about options available to you and visit directly with your manager if you have a unique situation.

Unplanned Absences

Generally, an unplanned absence is when you miss one or more, consecutive scheduled workdays for a single reason (i.e. flu, family illness, hospitalization, etc.) without prior approval. In this case, four points will count for each unplanned absence.

Note: Consecutive absences counted as one occurrence must be approved by your manager. Absences and tardiness, or leaving work early, even if consecutive, are not considered a single event unless approved by your manager.

Unplanned Tardiness or Early Departures for a Scheduled Shift

An unplanned tardy is when you are late for the start of your shift or when you return from a paid break or meal break late, and have a pattern of returning from these breaks late. Your entries into our ADP Time Tracking system will be the basis for determining if you are tardy for the start of your shift and/or tardy for returning from a meal break.

If you have an unplanned tardy, you will receive the following accumulation of points:

- » One point for a tardy of six to 15 minutes
- » Two points for a tardy of 16 minutes to one hour
- » Three points for more than one hour and up to half of your scheduled shift
- » Four points for more than half of your scheduled shift

If you leave work early, you will receive the following accumulation of points:

- » One point for leaving 15 minutes or less prior to the end of your scheduled shift
- » Two points for leaving up to one hour before the end of the scheduled shift
- » Three points for leaving more than one hour and up to half of your scheduled shift.
- » Four points for leaving prior to completing one –half of your scheduled shift.

If business needs allow you the option of leaving early on a particular day, the offer will be extended by your manager and you will not have a point/s counted against your absence.



Performance Action

Should you reach your total points allowed for unplanned absences and/or tardiness, the following performance action will be taken over a calendar quarter.

Performance Action	
ACCUMULATED POINTS	
Twelve (12) Points	Coaching Session and Verbal Warning
Sixteen (16) Points	Coaching Session and Written Warning
Twenty (20) Points	Final Written Warning
Twenty-four (24) Points	Separation of Employment

Notes:

- **Application of accumulated Paid Time Off (PTO) hours:** Available paid time off hours will automatically be applied (in available full hours) for all tardies and absences unless otherwise approved by management.
- **Leave Without Pay:** Any absence resulting in Leave Without Pay (LWOP) will result in automatic disciplinary action unless approved by management and/or Human Resources.
- **Patterns:** Employees who display a pattern of inability or failure to report to work may be subject to corrective action regardless of their overall performance record. Should you establish a pattern of absences, such as consistently having three (3) or more consecutive days/shifts in any given three-month period, or routinely calling off on Mondays and/or Fridays, performance action may be taken regardless of the overall attendance record.

Pattern of Behavior

Should you choose to show a pattern of behavior that demonstrates you are unable or unwilling to attend work regularly, your choice to do so ultimately creates a hardship for our team and clients. We also understand that extenuating circumstances can cause unforeseen issues and in this case, you should proactively meet with your manager and/or Human Resources to explore alternatives.

No Call / No Show

Not reporting or calling into work will result in a final written warning. Should you choose to not communicate with your manager and / or not arrive to work as scheduled a second time, your employment with NAVEX Global may end. Any no call/no show lasting three days is considered job abandonment and will result in your separation of employment with NAVEX Global.



Family and Medical Leave

Absences that qualify under the Family and Medical Leave Act (FMLA) or Oregon Family Leave Act (OFLA) will not be counted against your attendance record. Appropriate documentation from your health care provider will be required to support your absence; please work directly with our Human Resources Team in the event you have a need for FMLA and / or OFLA.

Extenuating Circumstances

NAVEX Global recognizes extenuating circumstances can occur in your life. In the event you are in a serious accident and/or hospitalized, as an example, NAVEX Global will naturally exercise discretion and work with you in regards to such situations.

Disclaimer

NAVEX Global reserves the right to amend or discontinue this policy at any time without notice.

[End Contact Center Attendance Policy for Non Exempt Professionals](#)

Background Checks

Each candidate invited to join our NAVEX Global Team is required to successfully pass a background check, which includes education verification, right to work, review of any criminal activity and a 9-panel drug test. NAVEX Global may also run background checks on team members post their hire date per client requests or for investigative purposes.

In the instance any candidate or team member is unable to clarify information verified in the background check, the ability to join or continue employment with NAVEX Global may be inhibited. Additionally, any candidate or team member choosing to not take the 9-panel drug test within the required timeframe, or otherwise fails this test will not be eligible to join or continue employment with NAVEX Global.

Dress Code

NAVEX Global strives to be known as a place where people love their work and their environment while delivering over the top results. We believe this can happen best in a workplace that encourages creativity, is open to the expression of ideas and communication, and ensures programs and practices align with our core values.

How we choose to dress at work is a reflection of our entire team and how we want to be experienced by our colleagues, vendors, and our clients; it sets the tone for what you want to be known for!

So can you wear jeans or shorts? That is your decision to make! We trust you can decide what is and isn't appropriate, including when to spruce things up a bit, such as when our clients and special guests will be on-site.

When you're thinking about the options sitting in your closet and wondering how your choices might be perceived, here are a few tips to keep you from being on the receiving end of the "shock and awe stare down":

- » Ensure your dress is not more casual than those of our clients, consultants or vendors.
(Remember, we're proud of what we do and who we are!)
- » Save your extra low tops, extra high skirts, flip flops, and worn out tees for the garden.
- » Start your day with clothes you would not wear to a night club.
- » And of course, plan to exclude any racially offensive, sexually suggestive, violent or other inappropriate graphic

Before you leave your home for the office or to meet with a client, give thought to how others may respond physically to your choice of perfumes and colognes (remember less is more).

If your dress is questionable your manager or a Human Resources team member will talk to you privately and let you know. Depending upon the situation you may be asked to leave the office and return with a better choice.

Drugs and Alcohol

As representatives of NAVEX Global, we have a 24 x 7 responsibility to ensure our conduct is experienced in the most positive and professional manner by our colleagues and clients. Inappropriate use of alcohol and drugs conflicts with this goal and contractual commitments to our clients and can create significant risk and exposure to you and NAVEX Global.

All employees are expected to report to work free of alcohol or other drugs, and be in suitable mental and physical condition to responsibly perform. If the

possession, use, sale, distribution, or influence of alcohol, illegal drugs, or other controlled substances interferes with these goals, appropriate action will be taken, including possible separation of employment. This applies to employees on Company premises or in any other work circumstance that may jeopardize NAVEX Global's operations, safety or reputation.

Illegal Drugs

Acts involving illegal drugs on Company premises will be reported to the appropriate authorities. In accordance with federal law, employees of NAVEX Global are required to notify their supervisor if they have been convicted of a criminal drug offense occurring in the workplace within five days after the conviction. NAVEX Global has the obligation to report those convictions to our clients that are contracting agencies as defined by the Drug-Free Workplace Act of 1988.

In situations where there is a reasonable suspicion that an employee is under the influence of drugs during work hours, NAVEX Global reserves the right to require the employee to undergo an immediate medical evaluation. If the employee refuses to undergo a medical evaluation, he or she will be subject to discipline, up to and including termination.

Prescription Drugs

The safe, appropriate use of legal drugs prescribed by a licensed physician is acceptable. It is however, your responsibility to verify with your physician that it is safe to report to work while taking prescription drugs and to advise your manager or Human Resources if there may be work-impacting side-effects.

“SAY IT!”
We voice what matters



Alcohol During Work Hours

During the times it is acceptable to drink during work hours as approved by your manager, it is important that you ensure your judgment is never impaired and that your behavior never puts yourself, NAVEX Global, or others at risk.

Any employee who does not abide by NAVEX Global's Drug and Alcohol Policy will be subject to appropriate disciplinary measures, which may include separation of employment. This Policy covers both drink-related incidents at work and alcohol-related offenses outside work which may damage NAVEX Global's reputation.

Alcohol at NAVEX Global Sponsored Events

At NAVEX Global sponsored functions, events, or training programs, alcoholic beverages may be served at the discretion of the team's lead, but only with appropriate safeguards and in conformance with the law. Following are steps executive leaders in charge of special events should take in order to minimize potential risk:

1. Send a pre-activity email. Before the activity or event where there will be alcohol, send an e-mail reminding employees not to drink to excess and never to drink and drive. Advise them not to drink if they are on medication, allergy medication or are pregnant. Encourage people to act responsibly and remind them of our strict practice against work place harassment.

2. Provide transportation. In the event an employee (or colleague of) feels that their consumption of alcohol makes it unsafe to drive, the employee should:
 - a. Request a ride from another employee, supervisor or manager who is not under the influence of alcohol;
 - b. Contact someone to pick them up; or
 - c. Call a cab service and request reimbursement from the Company.
3. Hire a bartender and use bar tickets. Have a professional bartender monitor the amount of alcohol employees are consuming by providing two bar tickets per employees. Instruct the bar attendants to not serve anyone who appears to be intoxicated and to inform NAVEX Global management if an employee has been refused service. Obtain a written contract with the bartender, or restaurant/facility, and obtain proof of insurance including liquor liability.
4. Serve food and offer plenty of non-alcoholic beverages. Only serve alcohol while serving food. Close the bar one hour prior to the event concluding.

If applicable, shift liability via contract. If an event is taking place at a hotel or restaurant, have a contract with the facility that states that the bar staff will identify, and not serve, intoxicated employees and will report them to NAVEX Global representatives. If it is possible, have the contract shift liability to the facility.

What to Avoid

- » Mixing alcohol with potentially dangerous activities, such as swimming and skiing.
- » Waiting too long to address and remove an employee from the event that may be intoxicated.

For Events Involving Physical Activity

- » Provide Safe Sporting Equipment. If equipment is rented, have each employee sign the release provided by the rental company.
- » Provide Safety Equipment and Training. For each event, make sure employees use the necessary safety equipment. If training is appropriate, use a qualified trainer.
- » If an employee has difficulty in meeting NAVEX Global's required standards because of his or her dependency on alcohol, NAVEX Global strongly encourages the individual to seek medical advice and/or counseling. NAVEX Global will strive to provide full support to the employee in his or her recovery from alcohol dependency.



Electronic Communications and Use

NAVEX Global believes the use of technology in the workplace is vital to productivity and enhances communication connections across the organization and with our clients.

We trust our team members will manage their access to NAVEX Global's equipment with the utmost care, confidentiality and professionalism. In the event a member of NAVEX Global's management team questions your electronic communications, NAVEX Global may audit, access / or make known any transaction such as phone use, voice mail, instant messages, blogs, wikis, and email messages for investigative purposes.

NAVEX Global also believes your electronic communication can have the utmost, positive impact on our culture when managed well. Following are some, but not all examples of actions that would be considered out of alignment with this goal:

Intentional impersonation and/or misrepresentation of another individual.

- » Modifying a message and forwarding without noting the changes
(i.e. deletions, removal of recipients, modify content, etc.).
- » Forwarding Company sensitive information to external sources.
- » Reading someone else's mail without permission and/or tampering with the NAVEX Global e-mail system.

Electronic Use

All electronic and telephonic communication systems and all communications information transmitted by, received from, or stored in these systems are the properties of NAVEX Global and as such are to be used for job-related purposes only. The use of any software and business equipment, including but not limited to facsimiles, computers, the e-mail system, the Internet, and copy machines for private purposes without prior authorization are strictly prohibited. It is important to remember that these computers and workstations may be inspected and reassigned at any time. Employees should keep no personal information in desk drawers or on computer hard drives, as NAVEX Global does not guarantee privacy related to any personal items stored in or on any NAVEX Global property.



- a. **Browsing:** The Internet is provided as a useful tool for the company to conduct business. During work hours, employees may use the Internet to perform current tasks at NAVEX Global. Employees may use the Internet for personal use during rest or meal breaks, however the browsing or downloading of inappropriate sites is strictly prohibited. Violation of this policy subjects employees to disciplinary action including termination of employment. NAVEX Global reserves the right to determine whether any accessed sites are inappropriate in its sole discretion.
- b. **Virus Free Environment:** Computer viruses are harmful to our system, spread very easily and could compromise our security. No file should be downloaded or opened (if from an email source) unless it relates directly to NAVEX Global business. In addition, files with .VBS or .SCR extensions are never to be opened. Files with an .EXE extension in an email attachment requires IT permission to open. If in doubt, get assistance from IT.

In addition to being cautious when opening e-mailed attachments, employees are also required to be cautious when downloading from the Internet. No file should be downloaded to an NAVEX Global computer unless it is directly related to NAVEX Global business and supervisory permission to perform the download has been received.

It is necessary to follow these guidelines to enable NAVEX Global to conduct business in a virus free environment.

- c. **Using NAVEX Global Telephones for Personal Use:** The number and length of personal phone calls should be kept to a minimum and any non-business related long distance calls should be made during non-working time using a personal credit card or prepaid calling card.
- d. **Using NAVEX Global Communication Devices for Personal Use:** NAVEX Global recognizes that from time to time, employees use workstation equipment for entertainment or other personal purposes (*i.e. solitaire, letter generation, Internet, etc.*). This computer time should be limited and it is expected that all such usage will fall within reasonable standards of professionalism and the guidelines of the Code of Ethics and any other NAVEX Global policies.

Use of NAVEX Global equipment to create or edit resumes, job-hunting the Internet using NAVEX Global's Internet connection, and job-hunting during assigned working hours on Company time is prohibited and could result in immediate termination.

Employees may use NAVEX Global equipment to do class work or to do volunteer work to the community, provided they have obtained specific permission to do so from their immediate supervisor and is approved by management. This usage must take place outside of NAVEX Global office hours, and generally should not be done at "lunch" or as a "break". It is recommended that at the end of class or volunteer usage, the necessary files be placed on a thumb drive to insure the separation of personal and business use of the computer. Any use of paper, disks or other resources that could be viewed as excessive should be reimbursed to the company at the time of use.

***Note:** NAVEX Global has reserved the right to monitor the use of all such equipment, as it deems necessary. This includes monitoring Internet usage and telephone calls. In addition, all information, including email and files, which are stored on the Company's servers and equipment are the property of NAVEX Global, Inc. and may be accessed, viewed, downloaded, copied or destroyed at NAVEX Global's discretion.*

- e. **Bringing Software or Hardware into your Personal Workspace:** No employee may bring software or hardware into NAVEX Global for either personal or company use. If an employee feels that the Company needs a program, he or she should submit the request to management, which will consider whether it is necessary for NAVEX Global's business. This includes all internal computer hardware and external peripheral devices.

Employment at Will

NAVEX Global adheres to the principle of employment-at-will and no employee has a guarantee of continued employment for any particular or indefinite period of time. Your employment with NAVEX Global is a voluntary one and is subject to termination by you or NAVEX Global at will, with or without cause, and with or without notice, at any time.

Employment Categories

Each employee of NAVEX Global is designated as either non-exempt or exempt from federal and state wage and hour laws. Your personal classification, or that of any other employee's, may be changed upon notification by NAVEX Global management.



Non-Exempt Employees

Non-exempt employees are entitled to overtime pay under the specific provisions of federal and state laws and receive compensation for the actual amount of time spent at their job. As a non-exempt employee, you are entitled to receive time and one-half of your regular rate of pay after forty (40) hours worked in a workweek or as otherwise mandated by state and local laws.

Exempt Employees

Exempt employees are salaried employees whose nature of work is primarily managerial, administrative, professional, or outside sales as provided for in the Fair Labor Standards Act.

In addition to the above categories, each employee is identified as regular full-time, part-time, or defined term.

Regular Full-Time

Regular full-time employees are those who are not in a temporary, intern, or seasonal status and who are regularly scheduled to work in excess of 30 hours per week. Generally, they are eligible for NAVEX Global's benefits, subject to the terms, conditions, and limitations of each benefit program.

Part-Time

Part-time employees are those who are not assigned to a temporary, intern, or seasonal status and who are regularly scheduled to work less than 30 hours per week. They receive all legally mandated benefits (such as *Social Security and workers' compensation insurance*) and are eligible for 401k, but are ineligible for all of NAVEX Global's other benefit programs.

Defined Term

Defined term employees are hired as interim support, to temporarily assist in the completion of a specific project. Employment assignments in this category are for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Defined term employees receive all legally mandated benefits (such as workers' compensation insurance and Social Security), and are eligible for all other NAVEX Global benefits (assuming they are working 30+ hours a week), with the exception of paid time off. They are able to work with their manager to accommodate for any time off they may need.

If you have questions regarding your category of employment, please speak with your manager or Human Resources.

Employment of Friends and Family

As a NAVEX Global employee, you have the opportunity to recruit some of our best candidates and you are encouraged to recommend qualified friends or family members to apply for any open position within the Company. *(Please see the NAVEX Global Employee Referral Program for additional information on referring candidates to NAVEX Global.)*

NAVEX Global always seeks to hire the best candidate for each job and when one of your friends or family members is being considered for a position, the same criteria for selection applies as it would for any other candidate. If a candidate is a member of your family, the following additional evaluations will be made:

- » Neither of the two related employees may report to the other.
- » Employment decisions, such as salary or performance, may not be influenced by one relative concerning the other.
- » There are no other inherent risks or liabilities to NAVEX Global as a result of the new hire.

In this context, a relative refers to a spouse, domestic partner, child, parent, sibling, grandparent, grandchild, aunt, uncle, first cousin, or corresponding in-law or “step” relation. This practice applies to employees of all employment classifications.

Employment Verification and References

NAVEX Global’s policy is to provide current or last position held, as well as the dates of employment. In the event a separated employee has executed a Release and Waiver for references, NAVEX Global may choose to provide substantive information regarding the employee’s work at NAVEX Global.

In the event you are personally contacted for such information, please forward the request to Human Resources so the employee’s requests for verification and reference management can be honored. Our responsibility is to safeguard the privacy of each employee, ensuring that any released information is accurate and consistent.

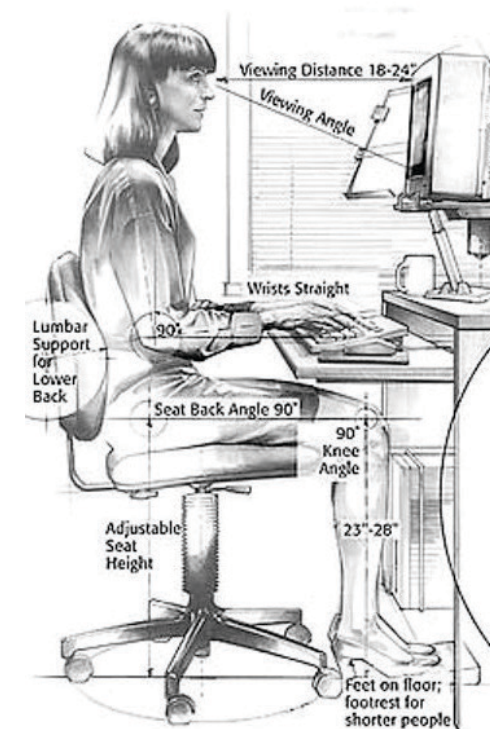


We explore all possibilities

Ergonomics

NAVEX Global is committed to providing you with a safe workspace that enables you to be both productive and comfortable. NAVEX Global also recognizes each team member is unique and that in some cases additional resources may be needed to improve your comfort and overall productivity, and/or accommodate an injury or disability affiliated with the American with Disabilities Act (ADA).

To support your ergonomic needs, following are tips that can help minimize discomfort in addition to tools you can request from your manager to improve your comfort, including steps you can take to request a formal ergonomic evaluation of your workspace.



Your Workplace

Your body, monitor, and keyboard should form a straight line; adjust your setup if you have to rotate your trunk or neck to type or view your screen.

Ensure your monitor is directly in front of you and at least 20 inches away. The top line of your monitor screen should be at or just below eye level. Take periodic breaks and/or vary your tasks as you can; this will help to reduce discomfort, fatigue, or repetitive strain injuries.

Your Chair

Your backrest should conform to the natural curvature of your spine, and provide adequate lumbar support.

The seat should be comfortable and allow your feet to rest flat on the floor or footrest. Your forearms and wrists should be about desktop height when your elbows are at 90 degrees.

Your Keyboard and Mouse

Put the keyboard directly in front of you; your shoulders should be relaxed and your elbows close to your body. Your wrists should be straight and in-line with your forearms. Keep the mouse close to the keyboard and use keyboard short cuts to reduce extended use.

Requesting an Evaluation

You may request an ergonomic evaluation with a written request from your health care provider or through your manager’s approval by contacting a member of our Human Resources Team.

Equal Employment Opportunity

NAVEX Global does not discriminate against any employee or applicant for employment based on race, color, religion, sex, age, national origin, disability, sexual orientation, gender identity or expression or any other status protected by law.

Employees of and applicants to NAVEX Global will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for qualified individuals.

Full Disclosure Policy

At any point following your hire date at NAVEX Global, you are required to disclose any criminal convictions or felony charges filed against you to a member of our Human Resources team within 3 days of the incident. Team members failing to self-disclose may be subject to disciplinary action, up to and including termination.

Immigration Law

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility.

Per government regulations, NAVEX Global also engages E-Verify – an Internet based system operated by the Department of Homeland Security in partnership with the Social Security Administration that allows employers to electronically verify the employment eligibility of newly hired employees.



Internal Team Transitions

NAVEX Global is committed to supporting our team members interested in exploring new opportunities within NAVEX Global. In fact, we believe advancing talent from within not only strengthens our culture, it advances our ability to perform as a team.

Here's how you can explore a new opportunity at NAVEX Global:

1. After working in your existing role for at least 12-18 months and consistently meeting performance expectations, share with your manager the position you are interested in pursuing and request their approval prior to pursuing the new position.
2. Send a formal note of interest with your resume to Recruiting@navexglobal.com and confirm your manager is aware of your interest in the new role. Plan on presenting your resume and yourself throughout the process with the same high standards that caught our attention as an external candidate with NAVEX Global. Please do not submit your application on-line.
3. Take advantage of your internal candidate status by visiting with people that are familiar with the open position to learn as much as possible about the current opportunity.
4. One of our recruiters will follow up with you regarding the role and work with the hiring team to ensure we are meeting both the hiring managers' needs and developing your career goals.
5. Be prepared to speak to the value you can offer NAVEX Global in your new role and how you would support your current team during a transition in the event you were invited to join a new team.

Note: Although 12 months is the minimum amount of time before an internal transfer will be allowed, certain positions may require less or a longer minimum period of time, however generally not more than 18 months. Candidates for these positions will be advised of the minimum transfer period as part of the application process. Also, in the event departing your current role creates a significant hardship on NAVEX Global, either due to our client commitments or other team dynamics at the time, we may need to work with you to identify a future window of time to pursue a new role.

For Hiring Managers:

Managers looking to hire an internal team member and provide a change in pay that is 10% or higher must secure approval from Cindy Raz and Bob Conlin. Hiring managers should also be prepared to extend as much flexibility as possible to the team member's current team to ensure a supportive transition.

If you have any questions about our internal transfer process, please reach out to Sophie Castro-Davis (scastrodavis@navexglobal.com).

Leaving NAVEX Global

Voluntary Separations

NAVEX Global recognizes that situations may arise, for both personal and professional reasons, which place you in a position to consider resignation for other opportunities or life experiences. If you choose to voluntarily leave NAVEX Global, we ask for a two-week written notice. More notice may be helpful for communicating this transition to clients you have worked closely with to ensure a smooth transfer of responsibilities.

In all cases, NAVEX Global wants to ensure that you have all the information and counsel you need during any decision-making or transition process. Please speak with your supervisor or a member of our HR Team about your work or new experience options to ensure that your personal and professional goals are fully understood.

Beyond a voluntary resignation, following are examples where your separation from NAVEX Global would be classified as voluntary:

- » You are absent from work for more than two consecutive workdays without notifying your manager or Human Resources of the reason for your absence and its expected duration.
- » You do not return from a leave of absence or notify NAVEX Global of your intent to return.
- » You do not return or notify NAVEX Global of your intent to return to work from the date of an authorization to return to work by your health care provider in the case of absence due to illness or injury.
- » You decline to accept an employment offer presented by NAVEX Global for a regular position that is comparable to your current position within three (3) business days.

Prior to your last day, a member of the Human Resources team will touch base with you to review any exit processes and paperwork as well as answer any questions you may have.

Involuntary Separations

Involuntary separation is a release or dismissal from employment initiated by NAVEX Global for a variety of reasons and situations.

The following examples are some (but not all) instances which could lead to involuntary separation:

- » Disclosing confidential and proprietary information or materials.
- » Misrepresenting or falsifying records, including e-mail, time records, or network communications.
- » Fraud, attempted misappropriation or possession (without proper authorization) of Company property or the property of other employees.
- » Not performing at effective levels, or acting in a manner that is not in the best interest of NAVEX Global's relationships, reputation, image or financial affairs.
- » Possession of or use of, firearms or explosives on NAVEX Global's premises, or other means of physical violence.
- » Violation of NAVEX Global's Code of Conduct or Workplace Practices.
- » Possession, transfer, or use of illegal substances or alcohol, or being under the influence of intoxicants or illegal substances, while on Company premises or on working time.
- » Illegal acts outside NAVEX Global that are related to or have an impact on your position, including anti-bribery and anti-corruption laws.

Benefit Continuation (COBRA)

The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under NAVEX Global's health plan when a "qualifying event" results in the loss of eligibility. Some common qualifying events are voluntary or involuntary termination of employment for reasons other than "gross misconduct" or reduction in the number of hours of employment.

Under COBRA, the employee or beneficiary pays the full cost of coverage at NAVEX Global's group rates plus an administration fee. NAVEX Global will provide each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under NAVEX Global's health insurance plan. It is the employee's obligation to read this information and take any action required to protect his or her rights under COBRA.

Office and Switchboard Hours

NAVEX Global has a 24x7 business model and office hours vary by department and position. Additionally, employees based in our headquarters may work in locations outside their on-site office. If you have questions about your work schedule, please contact your manager.

Following are the hours NAVEX Global’s switchboard is open:

City, State / Country	Switchboard Hours
Rexburg, ID	NA
Norcross, GA	8:00am to 5:00pm EST
Charlotte, NC	8:00am to 5:00pm EST
Lake Oswego, OR	7:00am to 5:00pm PST
London / United Kingdom	NA

On the Job Injury

Your safety at work is of utmost importance to NAVEX Global. If you experience an injury at work, please notify your manager, Human Resources, or a member of senior management. Choosing to not communicate your injury could result in you bearing responsibility for any medical bills that may incur as a result of your injury.

Pandemic Preparedness

NAVEX Global is committed to providing a safe workplace that includes sharing information published by the Department of Health and Center for Disease Control with regard to the activity level and risks associated with various diseases, and steps you can take to care for yourself in the event of a possible pandemic flu.



Preventative Steps You Can Take

Influenza is thought to spread mainly from person-to-person through coughing or sneezing of infected people. Steps you can take to care for yourself and those around you include:

- » Staying at home when you are sick and limiting contact with others.
- » Covering your cough and sneeze with a tissue or your sleeve.
- » Washing your hands thoroughly with soap and water, especially after you cough or sneeze. Alcohol-based hands cleaners are also effective.
- » Avoiding touching your eyes, nose or mouth as germs can quickly spread.
- » Seeing your health care provider at any time you feel you or your family member’s health is in question.
- » Getting an annual flu shot.
- » Additional information on how to protect you and your family can be found at: Center for Disease Control (www.cdc.gov)
- » School Network for Absenteeism Prevention (www.itsasnap.org)
- » FEMA Emergency Checklist (http://www.fema.gov/pdf/areyouready/appendix_b.pdf)

If you are experiencing flu like symptoms, please ensure you stay home from work to care for yourself and keep your manager informed of your status.

Representing NAVEX Global

As a NAVEX Global team member, you have the opportunity and responsibility to represent our company by demonstrating the highest professional standards when engaging with your colleagues, our clients and vendors, and other affiliates of NAVEX Global. We want to set the bar high by engaging with others in a way that reflects our status as the leader in the Ethics and Compliance market. As such, we want you to be aware that how you conduct yourself and the decisions you make directly impacts how you and our team are experienced as an organization.

Following are expectations you are held accountable for upholding in various settings as a NAVEX Global team member.

General Social Conduct:

- » Ensure your social conduct never violates our Workplace Practices and Code of Conduct.
- » Manage conversations you may have in regards to NAVEX Global in and outside your work day in alignment with your non-disclosure agreement.
- » Ensure your use of alcohol (and/or legal drugs) does not compromise your ability to manage your behavior and decision making ability (think “less is more”).
- » Be cognizant of how socializing with your teammates or direct reports, during or after work hours, requires you to uphold the standards expected of you as an employee of NAVEX Global. (Getting intoxicated with your colleagues and direct reports that you view as friends could result in complex unintended consequences.)
- » Understand at all times how any inappropriate behavior, including on your personal time, could compromise NAVEX Global and your employment status.

Traveling on Behalf of NAVEX Global:

- » When traveling, be aware that you should never compromise our commitment to client confidentiality. If you are using your laptop on a plane, train, bus, etc., you should have a privacy screen protecting your data. In addition, any verbal discussions about NAVEX Global business should be conducted in a private setting.
- » Manage your travel expenses as if they were your personal dollars; expenses should always reflect adherence to our Travel and Expense policy and support our goal of achieving our financial targets.
- » Minimize your use of alcohol (and/or legal drugs) at all times. Under no circumstances should your behavior become impaired before, during or after work hours while traveling on behalf of NAVEX Global.
- » Remember you are representing NAVEX Global. You should absolutely avoid any illegal activities (examples include driving under the influence, using illegal drugs, soliciting prostitution, etc.). In addition, avoid putting yourself in situations that could result in personal or corporate reputational risk (for example, visiting a strip club).



Workplace Relationships

NAVEX Global recognizes as a team we spend a lot of time together. While we trust you will manage your workplace relationships with care, it is important to ensure you are aware of how a consensual, romantic relationship with a colleague or client could create unintended consequences for you and NAVEX Global.



Should you become romantically involved with one of your colleagues or a client, you are expected to disclose your relationship to Human Resources. Each situation will be handled on a case-by-case basis and may involve signing a “Consensual Relationship Agreement” acknowledging your relationship is voluntary, and/or the transfer of one team member to another role to ensure no conflicts of interest. NAVEX Global is not able to guarantee a new position will be available in the event a team transfer is needed.

Professional Photos

As a NAVEX Global team member, you have the opportunity and responsibility to represent NAVEX Global with the highest standards when engaging with each other, our clients and vendors, and other key parties. We trust that you will use great judgment when updating or providing photos of yourself to populate any of our internal or external technologies or publications.

Photos you submit for NAVEX Global use – internal or external, Lync or ADP, etc, should include the following:

- » Face should take up 60% of the frame
- » A solid background
- » Tip: Crop picture from top of shoulders
- » Attire that aligns with our dress code
- » An expression that best reflects yourself and NAVEX Global (save imagery with your favorite food, sunglasses, hats, cigars, etc. for your personal use!)

If you have questions about whether your photo is appropriate, please contact a member of the Human Resources Team.

Religious Practices at Work

NAVEX Global recognizes our team has a variety of personal views and beliefs, and that honoring such views can strengthen our understanding of and show respect for each other in the workplace.

NAVEX Global also recognizes some team members may wish to study their preferred religion and/or engage in prayer while at work. In an effort to honor the varying beliefs of all team members, any religious practice must be conducted in a voluntary manner during your work break and be outside of any formal business meeting or other like setting that could otherwise create discomfort for a non-participating team member.

NAVEX Global will not tolerate discrimination against any team member because of their individual religious beliefs and/or choices, or because of their lack of religious beliefs or choices, and will not tolerate any level of pressure to participate in a religious practice while at work.

If you have questions or concerns about a voluntary religious practice and/or are in need of any type of religious accommodation, please contact your manager and Human Resources.

Smoking

As part of NAVEX Global’s commitment to employee wellness, all office locations for NAVEX Global are smoke-free, including the use of e-cigs. This policy applies equally to all employees, clients, vendors and visitors. Employees may choose to smoke in designated areas outside of the office during breaks or meal times.



DISCOVER IT!

We explore all possibilities

Virtual Work Schedules

As a performance based organization, NAVEX Global recognizes the importance of people having options to define their ideal work environment. We believe your results are what matter most and not when or where you work to achieve your goals.

Eligibility

You know yourself best and the type of environment that will strengthen your ability to achieve results. If you are uncertain whether working from a virtual location is right for you, following are areas you should consider:

- » **Workspace.** Do you have a dedicated area in your home that will ensure the same level of focus and information security as if you were on-site at a NAVEX Global office? Do you have the appropriate office equipment to perform your job?
- » **Onsite requirements.** How often should you be on-site at a NAVEX Global office to ensure your success?
- » **Your skill set.** Can you create and meet productivity requirements for your role without your manager on-site? Are you confident your communication style will enable you to maintain response requirements with your team members and our clients?
- » **Relationships.** Do you feel you can build relationships needed both inside and outside NAVEX Global from any location? Are you comfortable using instant message, web cams and other technical tools to create a sense of “in person” connection with people?

Requesting a Virtual Work Schedule

To help ensure your virtual office is able to support your success and achieve performance expectations, each team member interested in working a virtual schedule will need to complete the following documents (located on the Human Resources Confluence Site):

- » Virtual Work Schedule Request and Agreement
- » Virtual Office Safety Checklist

If you need any assistance with these documents, please don’t hesitate to contact your manager or Human Resources.



Visitors and Guests

NAVEX Global warmly welcomes family members and other guests of our employees, and a variety of current and prospective clients to our various office locations.

To provide for the safety and security of our employees and clients, and care for our facilities, all visitors are required to check-in with the front desk receptionist upon arrival and wear a “visitor’s badge” during the visit.

Weapons at Work

Weapons are not permitted, at any time while on any property owned, leased or controlled by NAVEX Global, including anywhere business is conducted, such as customer locations, client locations, trade shows, restaurants, company event venues, etc. Weapons include, but are not limited to, guns, knives or swords with blades over four inches in length, explosives, and any chemical whose purpose is to cause harm to another person.

If you possess a concealed weapons permit as permitted by law, weapons are prohibited on NAVEX Global property or in any location in which the employee represents the company for business purposes, including those listed above.

Working Outside NAVEX Global

NAVEX Global asks a lot of our team members and believes the work you do at NAVEX Global will need to be a key priority in order for you to meet expectations. It is also recognized that our team has a broad level of interests and needs outside of work and that at times securing additional employment as a full-time employee may be meaningful and/or needed to you.

Should you choose employment outside NAVEX Global, your role should not conflict with your priorities or performance at NAVEX Global, nor be with a competitive organization.

Please do inform your manager and Human Resources if you are considering or have accepted a role outside NAVEX Global.

Workspace

NAVEX Global encourages you to personalize your workspace in a manner that reflects your personal work style and personality, while enabling a well-kept and productive workspace that also aligns with client commitments.



Workspace Décor

In some instances not all personal belongings are appropriate for the workplace and can be experienced as offensive or harassing of other employees. Examples of inappropriate items that are prohibited at NAVEX Global include, but are not limited to: Pictures, posters, calendars, cartoons, religious objects, or other objects that may reasonably be considered inappropriate or offensive to employees or visitors.

Confidentiality

In honor of our commitment to confidentiality and HIPAA regulations, you should ensure information is handled accordingly within your workspace at all times. Specifically, any sensitive information should be kept covered and/or stored at all times.

If you are a team member working inside our Contact Center, your workspace will need to be free of paper and writing instruments as all notes must be taken electronically and maintained within the Call Report Module Application.

Work Breaks

NAVEX Global recognizes our teams work extremely hard and encourages all team members to take breaks to care for themselves during the work day.

Non-exempt Professionals

NAVEX Global goes beyond wage and hour requirements by providing two, paid 15-minute breaks and one, 30-minute unpaid meal break for every eight hours worked each day.

A general schedule of paid and meal breaks is provided to Call Center Team members by your NAVEX Global supervisor/manager, and actual break times may vary based on business needs.

Exempt Team Members

Our exempt team members work a variety of different schedules and hours that often exceed a regular schedule of 40 hours. Exempt team members are encouraged to make decisions in regards to their breaks and lunch hours that balance results expected for their role along with caring for themselves during the work day.



WORKPLACE PRACTICES 2017

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