

Environmental, Social and Governance Policy

Marron Group Holdings Pty Ltd
ACN 631 941 403
(ultimate parent company of the Navitas Group)



Document

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|---------------------------|---|
| Document Name | Environmental, Social and Governance Policy |
| Brief description | This policy outlines the Navitas Group's environmental, social and corporate governance principles. Staff are to take these principles into account in their decision making. |
| Responsibility | Company Secretary |
| Initial Issue Date | 29 October 2019 |

Version Control

| Date | Version No. | Summary of Changes | Reviewer |
|------------|-------------|---|--|
| 29/10/2019 | 1.0 | Initial adoption | Company Secretary |
| 26/02/2020 | 1.1 | Added CEO mission statement in section 3 & minor mods. | Company Secretary and Head of Governance |
| 30/06/2021 | 1.2 | Strengthened principle relating to protection of human rights & minor mods. | General Counsel |

Key Related Documents

| Name | Location |
|---|------------|
| Anti-Bribery and Corruption, Fraud and Money Laundering Prevention Policy | Policy HUB |
| Anti-Discrimination and the Prevention of Harassment Vilification and Bullying Policy | Policy HUB |
| Diversity Policy | Policy HUB |
| Donations Policy | Policy HUB |
| Information Security Policy | Policy HUB |
| Delegations of Authority | Policy HUB |
| Privacy Policy | Internet |
| Risk Management Policy | Policy HUB |
| Values in Action | Intranet |
| Whistleblowing Policy | Policy HUB |

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1 Purpose

The Navitas Group is a socially responsible organisation and recognises the influence that environmental, social and governance (**ESG**) factors have on the Group's performance, reputation, and sustainability of its operations, as well as the significance of ESG factors in their own right.

This policy outlines the Navitas Group's ESG principles and requires all staff to take these principles into account in their decision making.

The adherence to the Group's ESG principles benefits all Navitas Group stakeholders.

2 Scope

This policy applies to the Navitas Group globally subject to applicable local laws and regulations.

For members of the Navitas Group that are not wholly owned or controlled by the Company, or who operate from a university partner site and are obliged to adhere to the university partner's policies, the Navitas Group shall use commercially reasonable efforts to promote adherence to the ESG principles in line with this policy.

This policy does not replace other specific policies or procedures to be followed for particular types of activities and should be read in conjunction with these other policies and procedures.

3 Mission statement

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

4 Principles

The Navitas Group is committed to operate its business in accordance with the following ESG principles to the extent practicable.

Environmental

- Use sustainable materials for printed material and consumables
- Reduce energy usage through energy efficient equipment and education
- Use videoconference technology to reduce air travel where appropriate
- Reduce waste to landfill and use of single-use plastics
- Comply with relevant local and international environmental conventions and legislation
- Incorporate sustainability in design and construction where possible
- Support a precautionary approach to environmental challenges

Social

- Deliver quality education to a diverse population of students
- Provide a safe and productive workplace and educational environment for all staff and students, including to implement effective measures to promote mental wellness
- Support public university partners as key stakeholders of the Navitas Group
- Recognise and embrace the skills, characteristics and experiences that people of all backgrounds bring to the Group (see [Diversity Policy](#))
- Support the protection of internationally proclaimed human rights and labour standards and, in particular: (i) to support initiatives to promote access to a quality education in disadvantaged

communities; and (ii) not knowingly engage in business situations that could result in the Navitas Group causing, contributing to or being directly linked to human rights abuses

- Uphold freedom of association and the effective recognition of the right to collective bargaining
- Promote the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation (See [Anti-Discrimination and the Prevention of Harassment Vilification and Bullying Policy](#))
- Treat suppliers fairly
- Engage actively with regulators, communities and other stakeholders on ESG issues where relevant
- Support the payment of competitive wages and benefits to employees and stakeholders

Governance

- Comply with applicable local laws and regulations
- Apply governance structures with appropriate oversight across the areas of audit, risk management and conflicts of interest (see [Risk Management Policy](#) and [Delegations of Authority](#))
- Adhere to high standards of business integrity and ethics and report failures to do so (see [Values in Action](#) and [Whistleblowing Policy](#))
- Ensure the alignment of shareholder and management's interests through appropriate compensation and other policies
- Ensure the security of personal information of students and staff (See [Information Security Policy](#)) and only use that information for valid purposes (See [Privacy Policy](#))
- Work against corruption in all its forms, including extortion and bribery and comply with applicable trade sanctions (See [Anti-Bribery and Corruption, Fraud and Money Laundering Prevention Policy](#))
- Provide timely information to the Board and promote transparency about the Navitas Group's operations

5 Implementation and responsibility

All staff have an obligation to comply with this policy and share responsibility for the integration of ESG principles into their decision making.

The Navitas Leadership Team has ultimate responsibility for compliance with this policy across the business and appropriate reporting to the Board.

The Company may use external resources, including consultants or industry experts, as relevant and necessary to inform and advise on ESG-related matters.

6 Reporting

Management will develop and maintain meaningful metrics to measure the Navitas Group's performance against ESG principles outlined in this policy and report on those metrics to the Board annually.

Management shall also report any material ESG issues that periodically arise to the Board as appropriate.

7 Definitions

Unless the contrary intention is expressed in this Policy, the following words (when used in this policy) have the meaning set out below:

| Term | Meaning |
|--------------------------------|---|
| Board | The board of directors of the Company |
| Company | Marron Group Holdings Pty Ltd, an Australian company and ultimate parent company of the Navitas Group |
| ESG principles | The Navitas Group's ESG principles outlined in section 4 |
| Group CEO | The Group Chief Executive Officer of the Navitas Group |
| Navitas Group or Group | The Company and each of its subsidiaries and entities in which it has a direct or indirect ownership interest of 10% or more. |
| Navitas Leadership Team | The Group CEO, Divisional CEOs and other senior executives nominated by the Group CEO |
| Senior Leaders Group | The Navitas Leadership Team and wider group of executives forming part of the Senior Leaders Group |

8 Review

This policy shall be reviewed annually by the Company Secretary in consultation with the Group CEO and General Counsel for the purpose of ensuring it continues to be relevant and appropriate for the Navitas Group. The Company Secretary shall provide any recommended amendments to the Board for its consideration.