Navas Human Rights Policy

Navas
Approved by: Tom Bollands
Approval Date: 11/05/2026
Next Review Date: 11/05/2027

1. Introduction and Purpose

Navas is committed to respecting and promoting human rights across our business operations, supply chain, and wider value chain. We recognise our responsibility to avoid infringing on the rights of others and to address adverse human rights impacts with which we are involved. This Human Rights Policy formalises our commitment to international human rights standards and outlines our approach to identifying, preventing, mitigating, and remediating human rights risks.

This policy aligns with the expectations set out in the **UN Guiding Principles on Business and Human Rights (UNGPs)** and supports our broader commitment to ethical and sustainable business practices. It is an essential component of our environmental, social, and governance (ESG) strategy and part of our due diligence obligations under evolving legal and market standards.

2. Scope of Policy

This policy applies to:

- All employees, officers, and board members of Navas
- Contractors, agency workers, and temporary staff engaged by the company
- Subsidiaries and joint ventures where Navas has operational control

- All entities and individuals within our **supply chain** and **value chain** that are affected by our operations, products, or services

- Communities in which we operate or may impact, either directly or indirectly

We expect our suppliers, business partners, and service providers to uphold equivalent human rights commitments, and we actively seek to engage with them to support continuous improvement.

3. Our Commitments

Navas commits to the following core principles:

3.1 Respect for Human Rights

We commit to respecting all internationally recognised human rights as defined in:

- The **International Bill of Human Rights**, which includes the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights

- The **International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work**, covering freedom of association, the elimination of forced and child labour, non-discrimination, and the right to collective bargaining

- The **UN Guiding Principles on Business and Human Rights**

3.2 Human Rights Due Diligence

We are committed to conducting regular and ongoing **human rights and environmental due diligence** (HREED) across our operations and value chain. This includes:

- **Identifying and assessing actual or potential negative human rights impacts**

- **Preventing or mitigating risks** where we may cause, contribute to, or be directly linked to harm

- **Tracking the effectiveness** of our response actions

- **Communicating** our efforts transparently to stakeholders

3.3 Remediation

Where we identify that we have caused or contributed to adverse human rights impacts, we will provide for, or cooperate in, their remediation. This includes establishing or participating in effective grievance mechanisms that allow individuals and communities to raise concerns without fear of retaliation.

4. Implementation and Oversight

The implementation of this policy is overseen by the **[relevant department, e.g. Sustainability, ESG, or Ethics and Compliance Team]**. Specific responsibilities include:

- Integrating human rights considerations into enterprise risk management and procurement processes

- Conducting regular human rights risk assessments

- Providing training and capacity building for employees and key partners

- Engaging with stakeholders including affected communities, workers, suppliers, and investors

- Maintaining a grievance mechanism to enable confidential reporting of human rights concerns

We embed human rights awareness in our decision-making processes and work to build internal and external capacity to prevent harm.

5. Approval and Governance

This Human Rights Policy has been **formally reviewed and approved by the Board of Directors** of Navas on 11/05/2026

The policy is reviewed **annually** or more frequently if required by changes in our operations, legal obligations, or stakeholder expectations. Updates will be approved by the highest governing body and published publicly on our website.

6. Public Disclosure

This policy is made publicly available on our corporate website and is shared with employees, suppliers, and key stakeholders. Our intent is to foster transparency and accountability, and to invite external feedback and dialogue to strengthen our approach.

7. Continuous Improvement

We recognise that respecting human rights is a dynamic responsibility that requires ongoing effort. Navas is committed to continuously improving our human rights performance through engagement, learning, and alignment with emerging best practices and standards.

For questions or feedback regarding this policy, please contact:
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