Modern Slavery Statement

Overview

The UK Modern Slavery Act 2015 requires commercial organizations supplying goods or services with the UK to publish a Modern Slavery Act statement setting out the steps taken during the previous financial year to ensure that there is no modern slavery taking place in their own businesses or in any of their supply chains.

In accordance with Section 54 of the UK Modern Slavery Act 2015, this statement sets out the steps that Navigant Consulting Europe, Ltd., (“Navigant UK”) has taken to ensure that slavery and human trafficking are not taking place in our business or in any of our supply chains.

Navigant UK is committed to compliance with the provisions of the Act, and is opposed to any form of slavery, servitude, forced labor or human trafficking.

Navigant's Organization Structure

Navigant Consulting, Inc. (“Navigant”) is a Delaware corporation and headquartered in Chicago, Illinois, USA. We have over 5,000 employees working across 60 offices globally. Navigant is a specialized, global professional services firm. We provide services to clients in healthcare, energy, financial services advisory and compliance, and disputes, forensics and legal technology across a range of advisory, consulting, outsourcing, and technology/analytics services.

Navigant UK provides management consulting services to companies, legal counsel, and government agencies in the United Kingdom and other countries in Europe, Middle East, Africa and Asia. The company provides disputes, forensics, legal technology, and healthcare and Energy sector related consulting services, serving clients in healthcare, energy, financial services, and construction industries. The company was incorporated in 2005 and is based in London, United Kingdom. Navigant UK operates as a subsidiary of Navigant.

Steps in our Core Business to Address Modern Slavery

Navigant’s values are the essence of our identity. They support our vision, drive our culture, and shape our employees’ conduct. Our values are:

- Respect
- Integrity
- Innovation
- Stewardship
- Excellence

Navigant’s Code of Business Standards and Ethics summarizes the principles of honest and ethical conduct that Navigant expects every employee to know and follow. The Code states that no one shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair dealing practices.

All Navigant UK employees are required to read the Code of Business Standards and Ethics and confirm they will adhere to the Code when they join Navigant UK, and annually thereafter.
Navigant UK has a robust recruitment policy that includes conducting checks confirming eligibility to work in the UK and other counties in which we operate to safeguard against human trafficking or individuals being forced to work against their will.

Navigant UK encourages its employees to report any issues or concerns they may have about potential ethics violations or other potentially illegal conduct, which may include modern slavery/human trafficking. We provide a confidential, 24-hour telephone hotline and internet-based reporting service to report issues or concerns. Employees can report concerns in a completely anonymous and confidential manner.

**Steps Taken in our Supply Chain**

Navigant UK’s supplier relationships are based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. Navigant UK will not knowingly use any supplier that uses forced, prison, or indentured labor.

Navigant’s Code of Business Standards and Ethics for Third Party Business Partners of Navigant Consulting and Its Subsidiaries (the “Third Party Code”) summarizes the principles of honest and ethical conduct for Navigant UK suppliers and is available to all suppliers on Navigant’s website, Navigant.com. The Third Party Code states that no Third Party Business Partners shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts or any other unfair dealing practice. The Third Party Code also states that it is the responsibility of Navigant and Third Party Business Partners to provide a work atmosphere free of harassing, abusive, disrespectful, disorderly, disruptive or other nonprofessional conduct. Navigant UK requires new independent contractors and subcontractors, as well as existing independent contractors and subcontractors whose contracts are renewed, to read the Third Party Code and confirm they will adhere to it when they enter into a contractual relationship with Navigant UK.

Navigant UK conducts due diligence on key suppliers that includes an online search to check the organization’s reportable offenses through either its proprietary third-party assessment and risk mitigation tool or a background check vendor. Over the past year, key third-party suppliers that were not previously checked have been assessed through the assessment and risk mitigation tool.

**Future Plans**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Navigant UK will develop and implement specific training regarding the Modern Slavery Act for employees responsible for procurement.

- Navigant UK will conduct a review of our supplier contract language for inclusion of statements regarding our expectations to help prevent modern slavery and human trafficking.

- Navigant, including Navigant UK, is developing an Anti-Slavery policy to be included in our Employee Handbooks that will set out our stance on modern slavery and human trafficking, and explains how employees can identify instances of this and where employees can go for help.

- Navigant will review and update the Third Party Code to specifically state that slavery and human trafficking may not take place as part of our suppliers’ business or supply chains and suppliers will fully comply with all anti-human trafficking and anti-modern slavery laws.

- Navigant, including Navigant UK, will continue to review our key suppliers that contracted with us prior to the development of the Third Party Code, will provide the Code for their review and confirmation that they will adhere to the Code, and will continue to assess key suppliers through
the assessment and risk mitigation tool.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Navigant UK’s Modern Slavery Statement for 2017.

[Pending Approval of Navigant UK’s Board of Directors]