

Transparency in Policy Engagement and Political Participation

2018 Mid-Year Report



Navient
123 Justison Street
Wilmington, Delaware

NAVIENT®

Governance

The company's Government Relations Department, under the direction of the senior vice president for public policy and government relations, is responsible for government relations policies and activities and manages all political activities conducted by or on behalf of Navient. The department reports semi-annually to the Board of Directors' Nominations and Governance Committee on political contribution matters and major lobbying priorities. Additionally, as required by its charter, the Nominations and Governance Committee is composed entirely of independent directors and receives periodic reports on political expenditures, payments made to trade associations, and contributions made to other tax-exempt political organizations, as well as contributions by the company's Political Action Committee. The company maintains compliance processes intended to ensure that Navient and its employees conduct all its activities in accordance with our Code of Business Conduct and with all relevant laws governing political contributions and lobbying activities.

Navient actively engages in the democratic process and plays a role in forming policy to support the success of our customers, employees and shareholders. We are committed to fulfilling our role as an active corporate citizen with integrity and transparency.

This mid-year report covers activities from January 1, 2018 through June 30, 2018.

State and Federal Engagement

Policy proposals, legislation, and regulation can have an impact on our customers, employees and shareholders. Federal, state, and local policy changes can significantly affect our operations, customer outcomes and service experience, revenues, and costs. Because of this impact, we have a responsibility to engage with policymakers to educate, provide fact-based information, and to advance the success of our company and our stakeholders.

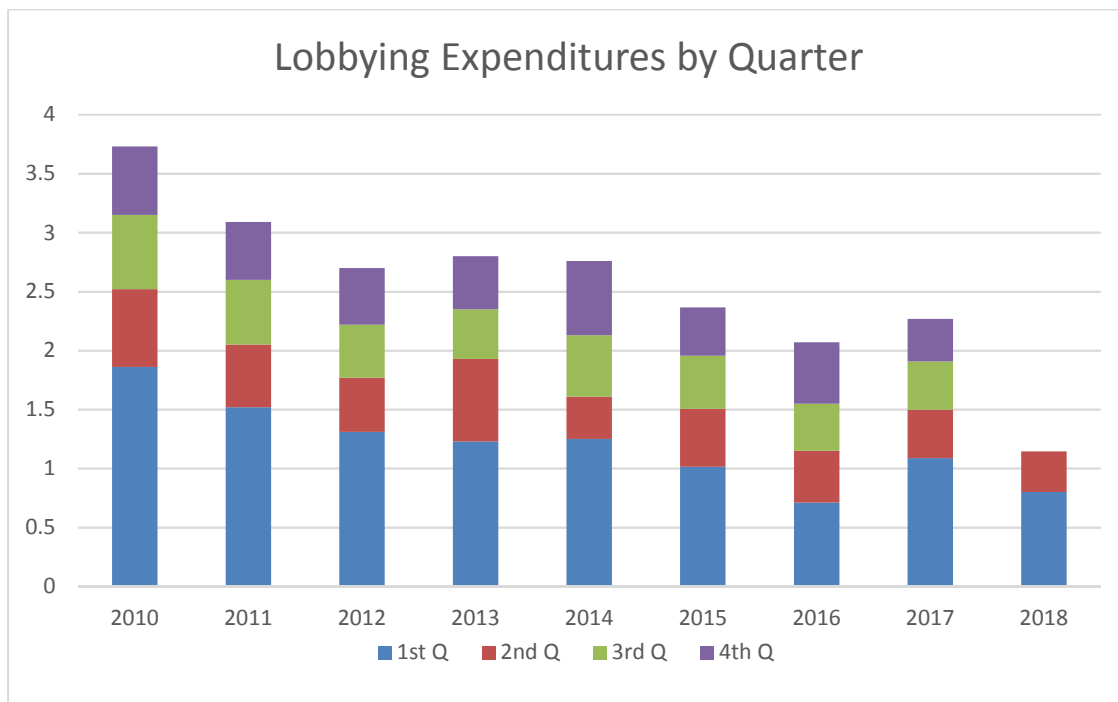
We regularly share our expertise, express our views, and provide public officials with factual briefings to inform their decisions. We monitor legislative activities, analyze trends, and advance ideas to benefit our constituencies. Because of our 40-plus-year history in helping student loan borrowers navigate their way to financial success, we are frequently consulted by members of Congress, congressional and legislative staff, and other policymakers about the impact of federal and state proposals.

Federal Lobbying

Meaningful engagement requires Navient to participate in the legislative process. The staff of Navient’s Government Relations Department is registered to lobby and actively lobbies on issues that affect our customers and business. Only members of the Government Relations team are authorized to direct lobbying activities on behalf of Navient. Navient policy requires these professionals to work with counsel to assure that they conduct their activities in compliance with applicable laws, rules, and regulations as well as maintain the highest standards of professional integrity.

We disclose publicly all federal lobbying topics and expenditures on a quarterly basis, in accordance with the Lobbying Disclosure Act. Navient’s quarterly filings are available at <http://soprweb.senate.gov/index.cfm?event=selectfields>. Navient’s political expenditures reflect our interests as a company and are made without regard for the political preferences of any individual director, officer, or employee.

Navient’s disclosures provide all federal lobbying expenditures, including fees paid to outside consultants. In the first half of 2018, Navient engaged the services of the Bockorny Group, The Kutler Group, Holland and Knight, Blue Point DC. and Van Scoyoc Associates, each of whom also file disclosures on their fees and activities on behalf of Navient. For the first half of 2018, Navient spent \$1.15 million on federal lobbying expenditures, including fees paid to outside consultants. The chart below shows lobbying expenditures by quarter for the past eight and a half years.



Among the topics we have advocated are:

- Better tools and information to help students and their families make informed borrowing decisions and help them successfully realize a return on their higher education investment
- Risk-based federal loan servicing and portfolio management approaches that help more borrowers avoid delinquency and default
- Ensuring that servicers have the necessary tools to contact borrowers and help them avoid default
- Streamlined repayment options to reduce complexity for borrowers and servicers and increase engagement
- Easier methods to enroll in and recertify federal income-driven repayment programs
- Programs that encourage borrowers to contact their student loan servicers
- More assistance to borrowers participating in the federal rehabilitation program to help them recover from default
- Improve federal budgeting to assure adequate funding for student loan delinquency and default prevention
- The establishment of a private loan rehabilitation program that creates a pathway for borrowers in default to get back on track and improve their credit
- A one-time credit bureau retraction for student loan borrowers who miss a payment while transitioning into repayment
- Require third party debt relief companies to disclose prominently the availability of such services from their loan servicer without cost
- Bankruptcy reform that allows federal and private student loans to be discharged after a good faith effort to repay
- Monitor and educate on issues relating to financial markets
- Employer repayment assistance programs that allow pre-tax dollar benefits to be used for student loan repayment
- Issues relating to the collections industry and ensuring government debt collection programs employ industry best practices

Political Contributions

The company's policies ensure that, consistent with federal law, Navient may not contribute corporate funds or make in-kind contributions to candidates for federal office or to national party committees. Navient does not use corporate funds to make independent political expenditures. We have not spent any corporate funds on communications to the general public that expressly advocate the election or defeat of a federal candidate and we have no plans to spend direct corporate funds on such communications.

State Contributions

Navient made no contributions to state or local elected officials or candidates during the first half of 2018.

Trade Associations

Navient participates in several trade associations that provide their members a variety of services including technical assistance, best practices, and that may also advocate on major public policy issues of importance to their members and the communities they serve. For most of these organizations, the primary purpose of Navient’s membership is for professional development, technical assistance, and best industry practices. Our payments for membership dues come with the recognition that we may not always agree with all the positions of an organization or its individual members. On occasion, some of these organizations may undertake specific projects on behalf of their members for which additional fees and expense reimbursements may be paid in addition to membership fees disclosed below.

Navient does not coordinate or earmark corporate funds toward election-related activity at the federal, state or local level, including contributions and expenditures in support of, or in opposition to, any candidate for any office, ballot initiative campaign, political party committee or PAC.

Below is a list of the membership fees paid to the principal organizations¹ in which Navient renewed a membership or became a new member at any point during the first half of 2018 and which conduct some lobbying activity:

Trade Association	2018 Membership and Other Fees
ACA International	\$11,000
Coalition of Higher Education Assistance Organizations	\$3,000
Community Home Lenders Association	\$6,000
National Association of College and University Business Officers	\$2,393
Structured Finance Industry Group	\$36,000
U.S. Chamber of Commerce	\$25,000

527 Political Organizations

Navient does not provide funding to groups organized under Section 527 of the Internal Revenue Code except for those listed below. We maintain our memberships in these groups to support our operations in

¹ We define principal organizations to include those trade associations that participated in lobbying activity and in which the company maintained a corporate membership and where our annual expenditures exceeded \$1,000. We do not consider a trade association to be a principal organization if our employees are members to satisfy professional licensing requirements. In addition to the national organizations listed in the table, Navient is a member of state and local chambers of commerce where we have a significant employee presence.

the states in which our employees work and live. Our contributions to these groups are membership dues and are not earmarked to support the election of any specific candidate nor for funding specific expenditures or communications. In addition, we do not consult with these groups regarding the expenditure of their funds.

Below is the list of six 527 groups that Navient contributed to in 2018.

Organization	2018 Membership Fees
Democratic Governors Association	\$10,000
Republican Governors Association	\$10,000
Democratic Legislative Campaign Committee	\$12,000
Republican State Leadership Committee	\$15,000
Democratic Attorneys General Association	\$15,000
Republican Attorneys General Association	\$15,000

Political Action Committee

The Navient Political Action Committee is funded solely through voluntary contributions from eligible employees. The PAC supports candidates, parties, and committees – on a bipartisan basis. The PAC does not contribute in connection with U.S. presidential elections.

Navient’s corporate policy requires that contributions from Navient’s PAC promote company interests without regard for the private political preferences of executives. The Navient PAC is governed by a board comprised of senior leaders from several corporate functional and geographic areas as well as business units. The PAC Board annually reviews and approves a giving framework. The board is chaired by the senior vice president for public policy and government relations. In deciding who to support, PAC leadership considers candidates who represent the communities we serve, underserved communities, those who serve on relevant committees or in leadership, and those who have shown support for policies and initiatives of importance to the company, its customers, and shareholders.

Contributions from Navient’s PAC, as required by law, are reported in filings with the Federal Election Commission and are made publicly available.

Navient 2018 Political Contribution Snapshot January 1, 2018 through June 30, 2018

Navient PAC Contributions to U.S. House of Representatives			
U.S. House Candidate	State	District	2018 Contribution
Rep. Susan Brooks (R)	IN	Congressional District 05	\$2,000
Rep. Matthew Cartwright (D)	PA	Congressional District 17	\$2,500
Rep. Joseph Crowley (D)	NY	Congressional District 14	\$1,000
Rep. Elijah Cummings (D)	MD	Congressional District 07	\$1,000
Rep. Dwight Evans (D)	PA	Congressional District 02	\$1,000
Rep. Virginia Foxx (R)	NC	Congressional District 05	\$1,000
Rep. Marcia Fudge (D)	OH	Congressional District 11	\$1,000
Rep. Brett Guthrie (R)	KY	Congressional District 02	\$1,000
Rep. Karen Handel (R)	GA	Congressional District 06	\$1,000
Rep. Alcee Hastings (D)	FL	Congressional District 20	\$1,000
Rep. Trey Hollingsworth (R)	IN	Congressional District 09	\$2,000
Rep. Bill Huizenga (R)	MI	Congressional District 02	\$2,000
Rep. Blaine Luetkemeyer (R)	MO	Congressional District 03	\$1,000
Rep. Tom MacArthur (R)	NJ	Congressional District 03	\$2,000
Rep. Gregory Meeks (D)	NY	Congressional District 05	\$1,000
Rep. Paul Mitchell (R)	MI	Congressional District 10	\$500
Rep. Gwendolynne Moore (D)	WI	Congressional District 04	\$500
Rep. Stacey Plaskett (D) At Large	VI	At Large	\$1,500
Mr. Greg Pence	IN	Congressional District 06	\$1,000
Rep. Bruce Poliquin (R)	ME	Congressional District 02	\$500
Rep. Linda Sanchez (D)	CA	Congressional District 38	\$1,000
Rep. Steve Scalise (R)	LA	Congressional District 01	\$5,000
Rep. Kurt Schrader (D)	OR	Congressional District 05	\$1,000
Rep. David Scott (D)	GA	Congressional District 13	\$1,000
Rep. Ann Wagner (R)	MO	Congressional District 02	\$2,500
Rep. Bradley Mark Walker (R)	NC	Congressional District 06	\$1,000
Rep. Greg Walden (R)	OR	Congressional District 02	\$1,000
Rep. Jackie Walorski (R)	IN	Congressional District 02	\$1,000

Navient PAC Contributions to U.S. Senate			
U.S. Senate Candidate	State	District	2018 Contribution
Sen. Roy Blunt (R)	MO	United States Senate	\$1,500
Sen. Deb Fischer (R)	NE	United States Senate	\$2,000
Sen. Heidi Heitkamp (D)	ND	United States Senate	\$4,000
Sen. Tim Kaine (D)	VA	United States Senate	\$1,700
Sen. Angus King (I)	ME	United States Senate	\$1,000
Sen. Robert Menendez (D)	NJ	United States Senate	\$2,500
Sen. Bill Nelson (D)	FL	United States Senate	\$1,000
Sen. David Perdue (R)	GA	United States Senate	\$3,000
Sen. Jon Tester (D)	MT	United States Senate	\$1,000
Sen. Mark Warner (D)	VA	United States Senate	\$1,000

Navient PAC Contributions to Leadership Committees		
Leadership PAC	Sponsor	2018 Contribution
All for Our Country Leadership	Sen. Catherine Cortez-Masto (D-NV)	\$1,000
Blue Hen PAC	Sen. Christopher Coons (D-DE)	\$3,000
Bridge PAC	Rep. James Clyburn (D-6th SC)	\$5,000
Citizens for Prosperity in America Today	Sen. Pat Toomey (R-PA)	\$2,500
Country Roads PAC	Sen. Joseph Manchin (D-WV)	\$2,500
New Pioneers PAC	Rep. Gregory Paul Walden (R-2nd OR)	\$1,500
More Conservatives PAC	Rep. Patrick McHenry (R-10th NC)	\$5,000
IMPACT	Sen. Charles Schumer (D-NY)	\$1,000
Just Lead PAC	Rep. Jason Mark Lewis (R-2nd MN)	\$1,000
Republicans Preserving Our Majority	Rep. Paul Mitchell (R-10th MI)	\$2,500
Seeking Justice Committee	Sen. Doug Jones (D-AL)	\$5,000
TIM PAC	Sen. Tim Scott (R-SC)	\$2,500
WOLF PAC	Rep. Emanuel Cleaver (D-5th MO)	\$1,500

Other Political Activity

Navient does not engage in, and expends no resources in support of, groups organized under Section 501(c)(4) of the Internal Revenue Code.

Navient does not engage in and expends no resources for grassroots lobbying communications, defined as any communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on legislation or regulation, and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation.

Navient does not engage in influencing and expends no resources to influence the outcome of ballot measures.

Other than as disclosed above, Navient does not belong to any other tax-exempt organizations whose purpose it is to influence federal or state policy, including organizations that write and endorse model legislation.

Employee Engagement

Navient encourages employees to participate in political and civic activities of their choosing. Our employees have the right to participate in the political process by making personal contributions from personal funds, subject to applicable legal limits. In accordance with our Code of Business Conduct, employees may not be reimbursed or otherwise compensated by Navient for any such contributions, and political activity must take place on personal rather than company time. The Code of Business Conduct requires employee interactions with government officials maintain the highest standards of ethical behavior.

To learn more, visit [Navient.com](https://www.navient.com).

Facts sheets and FAQs

[Navient.com/facts](https://www.navient.com/facts)

Corporate governance

[Navient.com/investors](https://www.navient.com/investors)