

Transparency in Policy Engagement and Political Participation

2022 Mid-Year Report



Navient
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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. As required by its charter, the Nominations and Governance Committee is composed entirely of independent directors and receives periodic reports on political risk, 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, 2022, through June 30, 2022.

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.

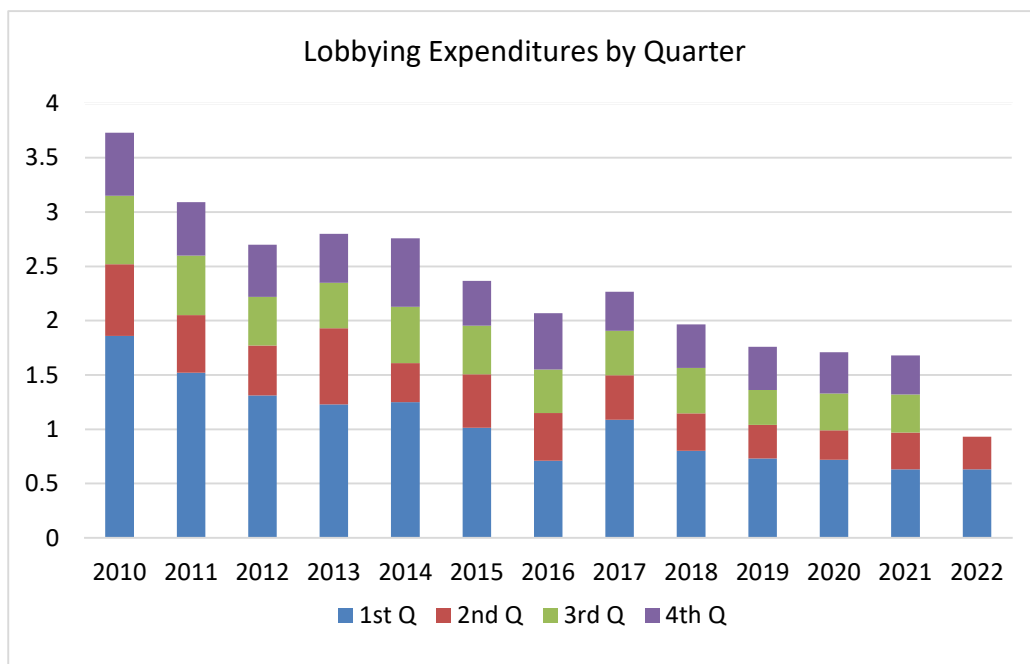
We regularly share our expertise, express our views, and provide public officials with factual briefings to inform their decisions. We monitor legislative activities, analyze trends, and advance ideas to benefit our constituencies. Because of our nearly 50 -year history in helping student loan borrowers 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 ensure 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 <https://lda.senate.gov/filings/public/filing/search/>. 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. During the first half of 2022, Navient engaged the services of the Blue Point DC, Bose Public Affairs Group, Invariant, the Madison Group, 1607 Strategies, and Stumptown Strategies, each of whom also file disclosures on their fees and activities on behalf of Navient. For the first half of 2022, Navient spent \$930,000 on federal lobbying expenditures, including fees paid to outside consultants. This amount was Navient's lowest first half expenditures in the last 13 years. The chart below shows lobbying expenditures by quarter during that period.



Among the topics for which we have advocated and for which we have supported legislation 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
- Streamlined repayment options to reduce complexity for borrowers and servicers and increase engagement
- Bankruptcy reform that allows federal and private student loans to be discharged after a good faith effort to repay
- Easier methods to enroll in and recertify federal income-driven repayment programs
- Improving assistance to distressed borrowers
- 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
- A one-time credit bureau retraction for student loan borrowers who have some delinquencies but have established steady repayment
- Improve federal budgeting to assure adequate funding for student loan delinquency and default prevention
- Educate policymakers on the differences between private education loans and federal loans and ensuring that assistance is targeted to struggling borrowers
- Require third party debt relief companies to disclose prominently the availability of such services from their loan servicer without cost
- 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. Navient's electoral related expenditures reflect our interests as a company and are made without regard for the political preferences of any individual director, officer, or employee.

State Contributions

Navient made no contributions to state or local elected officials or candidates during the first half of 2022.

Trade Associations

Navient participates in several trade associations that provide their members a variety of services including technical assistance, and best practices. Trade associations 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 political action committee (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 2022 and which may have conducted some lobbying activity:

Trade Association	2022 Membership and other fees
ACA International	\$23,596
American FinTech Council	\$25,000
HR Policy Association	\$16,791
Structured Finance Association	\$1,000

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.

527 Political Organizations

Navient does not provide funding to groups organized under Section 527 of the Internal Revenue Code other than those listed below. 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 four 527 groups that Navient contributed to in the first half of 2022.

Organization	2022 Membership and other fees
Democratic Attorneys General Association	\$15,000
Democratic Governors Association	\$30,000
Republican Attorneys General Association	\$15,000
Republican Governors Association	\$30,000

Political Action Committee

The Navient Political Action Committee (PAC) 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, who represent diverse 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. We aim to be bipartisan in our contributions and, in the first half of 2022, we gave evenly to Democrats and Republicans.

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

Navient 2022 Political Contribution Snapshot January 1, 2022 through June 30, 2022

The following lists shows each contribution made by the Navient PAC during the first half of 2022.

Navient PAC Contributions to U.S. House of Representatives			
U.S. House Candidate	State	District	2022 Contribution
Rep. Joyce Beatty (D)	OH	Congressional District 03	\$2,000
Rep. Lisa Blunt Rochester (D)	DE	At Large	\$1,000
Rep. Matt Cartwright (D)	PA	Congressional District 08	\$4,500
Rep. Yvette Clarke (D)	NY	Congressional District 09	\$1,000
Rep. Jim Clyburn (D)	SC	Congressional District 06	\$1,000
Rep. James Comer (R)	KY	Congressional District 01	\$1,000
Rep. Byron Donalds (R)	FL	Congressional District 19	\$2,000
Rep. Tom Emmer (R)	MN	Congressional District 06	\$5,000
Rep. Chuck Fleischmann (R)	TN	Congressional District 03	\$1,000
Rep. Michelle Fischbach (R)	MN	Congressional District 07	\$1,000
Rep. Sylvia Garcia (D)	TX	Congressional District 29	\$1,000
Rep. Al Green (D)	TX	Congressional District 09	\$1,000
Rep. Ashley Hinson (R)	IA	Congressional District 01	\$1,000
Rep. Steven Horsford (D)	NV	Congressional District 04	\$1,500
Rep. Bill Huizenga (R)	MI	Congressional District 02	\$1,000
Rep. Chris Jacobs (R)	NY	Congressional District 27	\$1,000
Rep. Robin Kelly (D)	IL	Congressional District 02	\$1,000
Rep. Darin LaHood (R)	IL	Congressional District 18	\$2,500
Rep. Julia Letlow (R)	LA	Congressional District 05	\$1,000
Rep. Stephen Lynch (D)	MA	Congressional District 08	\$1,000
Rep. Blaine Luetkemeyer (R)	MO	Congressional District 03	\$1,000
Rep. Lisa McClain (R)	MI	Congressional District 10	\$1,000
Rep. Dan Meuser (R)	PA	Congressional District 09	\$1,000
Rep. Mariannette Miller-Meeks (R)	IA	Congressional District 02	\$1,000
Rep. Joe Morelle (D)	NY	Congressional District 25	\$1,000
Rep. David Scott (D)	GA	Congressional District 13	\$1,000
Rep. Victoria Spartz (R)	IN	Congressional District 05	\$2,000
Rep. Elise Stefanik (R)	NY	Congressional District 21	\$1,000
Rep. Bryan Steil (R)	WI	Congressional District 01	\$1,000
Rep. Eric Swalwell (D)	CA	Congressional District 15	\$1,500
Rep. Beth Van Duyne (R)	TX	Congressional District 24	\$1,000
Rep. Maxine Waters (D)	CA	Congressional District 43	\$1,000
Rep. Nikema Williams (D)	GA	Congressional District 05	\$1,500

Navient PAC Contributions to U.S. Senate

U.S. Senate Candidate	State	District	2022 Contribution
Sen. Tom Cotton (R)	AR	United States Senate	\$2,000
Sen. Joni Ernst (R)	IA	United States Senate	\$2,500
Sen. Chuck Grassley (R)	IA	United States Senate	\$1,000
Sen. Bill Hagerty (R)	TN	United States Senate	\$2,500
Sen. Patty Murray (D)	WA	United States Senate	\$1,000
Sen. Tim Scott (R)	SC	United States Senate	\$2,500

Navient PAC Contributions to Leadership Committees

Leadership PAC	Sponsor	2022 Contribution
BLAINE PAC	Rep. Blaine Luetkemeyer (R-MO)	\$1,000
Hoosier PAC	Sen. Mike Braun (R-IN)	\$2,500
Innovation Political Action Committee	Rep. Patrick McHenry (R-NC)	\$5,000
MARSHA PAC	Sen. Marsha Blackburn (R-TN)	\$2,500

Navient PAC Contributions to Congressional Caucus and Party

Party/Caucus	2022 Contribution
Across the Aisle PAC (D)	\$5,000
CHC Bold PAC (D)	\$2,500
Congressional Black Caucus PAC (D)	\$5,000
DCCC (D)	\$15,000
DSCC (D)	\$15,000
Equality PAC (D)	\$5,000
NRCC (R)	\$15,000
NRSC (R)	\$5,000
Value In Electing Women PAC (R)	\$2,500

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.

Subsidiaries of Navient may participate in and be members of various industry associations that engage with government entities at the state and local level regarding policies, programs, and best practices. Such organizations include specialized industry groups in fields such as transportation, revenue, and health. Examples include the International Bridge, Tunnel & Turnpike Association (IBTTA), the Government Finance Officers Association (GFOA), and the American Public Health Association (APHA), among others.

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)