

## EEO/AAP Statement of Policy

Navient policies are intended to provide equal employment opportunities without regard to race, color, religion, sex, national origin, age, protected veteran, disabled status, gender identity, or sexual orientation. This policy relates to all phases of employment, including, but not limited to, recruiting, employment, placement, upgrading, demotion or transfer, reduction of workforce and termination, rates of pay or other form of compensation, selection for training, the use of all facilities, and participation in all Navient-sponsored employee activities. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity, or age limitations will be adhered to by Navient where appropriate.

As part of Navient's equal employment opportunity policy, Navient will also take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, protected veterans, and qualified disabled persons are introduced into our workforce and considered as promotional opportunities arise. Mike Smith, SVP & Chief Human Resources Officer, fully supports Navient's equal opportunity and affirmative action policies.

Employees and applicants shall not be subjected to harassment or intimidation because they have: (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state, or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state, or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state, or local law requiring equal opportunity.

Navient will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Navient's legal duty to furnish information. 41 CFR 60-1.35(c).

The above-mentioned policies shall be periodically brought to the attention of supervisors. It is the responsibility of each supervisor of Navient to ensure affirmative implementation of these policies to avoid any discrimination in employment. All employees are expected to recognize these policies and cooperate with their implementation. Violation of these policies is a disciplinary offense.

Brenda Lloyd, VP, Employee Relations & Employee Servicing Center, is assigned to direct the establishment of and to monitor the implementation of personnel procedures to guide the affirmative action program throughout Navient. Brenda Lloyd, will have responsibility to review and update Navient's affirmative action plan annually, including responsibility for the audit and reporting system. A notice explaining Navient's policy and availability for viewing the affirmative action plan will remain posted.



David Yowan, President and CEO

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