

NAVAN, INC.

WHISTLEBLOWER POLICY

PURPOSE

Navan, Inc. (the “*Company*”) is committed to the highest standards of ethics, integrity, and accountability and to complying with applicable laws, rules, and regulations related to its business. You are required to perform your duties and responsibilities with honesty and integrity and to comply with all applicable laws, rules, and regulations, as well as Company policies. If you become aware of an actual or suspected violation of our policies or of any laws or regulations, it is your responsibility and obligation to report it and you should do so without fear of reprisal or retaliation of any kind.

This Whistleblower Policy (“*Policy*”) applies to the Company as well as all Company subsidiaries and group companies, including Reed & Mackay. We have established this Policy to enable employees and other service providers to report any activity that is unlawful or otherwise violates our policies so that we can investigate and resolve potential violations as quickly and efficiently as possible.

You are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities as described below. This Policy is designed to provide you with a confidential or anonymous method for reporting any improper activities.

The Reed & Mackay Group has a complementary Whistleblowing Policy which is applicable to each company within the Reed & Mackay Group (the “*Reed & Mackay Policy*”) in addition to this Policy. The Reed & Mackay Policy applies to each company within the Reed & Mackay Group only. In the event of a conflict between this Policy and the Reed & Mackay Policy, this Policy will supersede.

PERSONS COVERED BY THIS POLICY

This Policy applies to all Navan group employees, contractors, consultants, agents, representatives, officers and members of our Board of Directors (“*Board*”).

WHEN SHOULD VIOLATIONS BE REPORTED

We ask that you follow this Policy to report good faith concerns regarding known or suspected violations of any of the following:

1. laws, governmental rules or regulations;
2. accounting, internal accounting controls or auditing matters; or
3. any Company policies (including our Code of Business Conduct and Ethics).

Keep in mind that your reporting obligation includes complaints or reports you might get from people outside of the Company and complaints regarding third parties who provide services to us.

HOW TO REPORT VIOLATIONS

If you believe that any violation has occurred or is occurring or you have a good faith concern regarding conduct that you reasonably believe may be a violation, you are required to promptly take one or more of the following steps:

1. Report the known or suspected violation to your manager and/or supervisor.
2. If you would prefer to speak to someone other than your manager or supervisor, you can report concerns to our General Counsel or their authorized designee.
3. We encourage you to internally report your whistleblowing concerns so that we may directly investigate the matter, but if you wish to report the known or suspected violation confidentially and anonymously you can:
 - Call our compliance hotline toll-free using one of the following numbers. This service is available twenty-four hours a day and seven days a week:

USA and Canada: 866 901 3295

United Kingdom: 0800 915 1571

Portugal: 00 800 7233 2255

Spain: 00 800 7233 2255

France: 00 800 7233 2255

Germany: 00 800 7233 2255

Netherlands: 00 800 7233 2255

Italy: 00 800 7233 2255

Switzerland: 00 800 7233 2255

Sweden: 0850 252 122

Israel: 012 800 7233 2255 (Golden Lines)

Israel: 013 800 7233 2255 (Barak)

Israel: 014 800 7233 2255 (Bezeq)

India: 000 800 4401 256

Australia: 1 800 312 928

Singapore: 800 448 1773

UAE: 8000 441 3376

Ireland: 1 800 812 740

- Report online from anywhere in the world at <https://www.safecall.co.uk/file-a-report/>

If you report using the above procedures, your report will automatically be directed to our General Counsel and the Chair of our Audit Committee. In accordance with applicable law, reports will be provided to the Company's Board of Directors (the "**Board**") or appropriate committee (e.g., the Audit Committee of the Board) as needed. Human resources complaints that do not involve accounting, internal accounting controls and auditing matters or violations of federal or state laws (including securities laws) or any other legal or compliance violation, will be reported to our human resources team.

You are encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern. In order to better respond to any reported concerns, it would be helpful if you provide your telephone number and other contact information when making the report. However, if you prefer to remain anonymous, you may report a concern without disclosing your name or position. Safecall is a third-party multi-language whistleblowing hotline service engaged by the Company specifically to provide a safe and confidential reporting service when needed. We will perform a periodic testing of the hotline to ensure it is active and there are no issues with reporting complaints or concerns.

If you wish to report a matter directly to our Audit Committee, you may use the internal and external processes described above and indicate that the report should be delivered directly to the Audit Committee.

INVESTIGATION

We treat all reports seriously. The Company will promptly review and address each concern as appropriate. This may involve an investigation conducted by qualified personnel. Investigations will be conducted confidentially to the extent practical and appropriate under the circumstances, recognizing that some disclosure may be necessary to effectively investigate the complaint. If reported to Safecall, Safecall will inform a nominated appropriate party at the Company that a report has been received. If the allegations relate to a nominated appropriate party, Safecall will notify a reserve. A decision will then be taken as to who is best placed to investigate and resolve the matter.

You should not conduct your own independent investigation into any suspected violations; instead make your complaint or report by following the procedures in this Policy. The General Counsel will review and coordinate the investigation and resolution of all complaints and reports of a suspected violation, as well as ensure that corrective action is taken, as necessary and appropriate.

The Company endeavors to operate on a highly transparent basis, and the Company wants to be made aware of alleged wrongdoings and to address them as soon as possible. We encourage you

to first address your concerns by following the procedures outlined herein for reporting to or through the Company, so that the Company may conduct its own internal investigation and take corrective action as quickly as possible. Among other things, the Company may choose to self-report certain matters to government or other agencies. However, nothing in this Policy is intended to prevent any employee from directly reporting information to law enforcement agencies when an employee has reasonable cause to believe that the violation of a law or regulation has occurred. A report to law enforcement agencies may be made instead of, or in addition to, a report directly to the Company through its management or the Company's reporting hotline.

WE DO NOT RETALIATE AGAINST WHISTLEBLOWERS

We will not retaliate, and we will not tolerate any retaliation against someone who reports actual or suspected violations in good faith. Any employee who engages in retaliatory conduct will be disciplined, up to and including termination. In some cases, federal, state, and/or local law provides that retaliatory action for reporting unlawful activity is illegal. Employees who object to or refuse to participate in a policy, practice or activity that is unlawful, fraudulent, criminal or incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment are also protected from retaliatory action.

We do not permit any form of intimidation or retaliation by any employee, contractor, subcontractor or agent of the Company against you because of any lawful act done to:

1. provide information or otherwise assist in an investigation of conduct you reasonably believe is a violation of any law, rule, or regulation, or of any Company policy; or
2. testify, participate in or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation.

Nothing in this Policy in any way prohibits or is intended to restrict or impede employees from discussing the terms and conditions of their employment with co-workers or union representatives/exercising protected rights under Section 7 of the National Labor Relations Act/exercising protected rights to the extent that such rights cannot be waived by agreement, or otherwise disclosing information as permitted by law.

CHANGES TO THIS POLICY

Our Board or a committee of the Board, reserves the right in its sole discretion to modify or grant waivers to this Policy. Any amendments or waiver may be publicly disclosed if required by applicable laws, rules and regulations.

ADOPTION AND AMENDMENT HISTORY

Adopted by the Board, effective as of October 29, 2025.