

**Eun Ah Choi**  
Senior Vice President  
Global Head of Regulatory Operations

October 29, 2025

Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

Division of Corporation Finance:

This is to certify that on October 29, 2025, The Nasdaq Stock Market (the "Exchange") received from Navan, Inc. (the "Registrant") a copy of the Registrant's application on Form 8-A 12(b)/A for the registration of the following security:

Class A Common Stock, \$0.00000625 par value per share

We further certify that the security described above has been approved by the Exchange for listing and registration upon official notice of issuance.

Sincerely,

