



IMPACT AT LAUREATE: FAQS



SOCIAL

1. Does Laureate Education commit publicly to eliminating ethnic discrimination?

Laureate Education is unequivocally committed to eliminating all forms of discrimination, including ethnic discrimination, across its global operations. Any form of harassment or discriminatory behavior, including racial harassment, bullying, intimidation, retaliation, and other interpersonal conflicts, violates Laureate Education's policies and are handled with the utmost seriousness by its Human Resources and Ethics & Compliance teams and are subject to thorough investigation and disciplinary action when warranted.

Laureate Education's network of institutions fosters academic communities where individuals from all backgrounds are respected, valued, and empowered to succeed. All employees and stakeholders are expected to uphold this standard, and we provide clear and confidential channels (such as the Laureate Ethics Helpline), for reporting any concerns related to discrimination or misconduct.



2. Does Laureate Education commit to ensuring equal opportunity?

Laureate Education is deeply committed to providing a work environment where all individuals are treated with respect and afforded equal opportunity, regardless of their background or personal characteristics. This commitment extends across all employment practices, including hiring, promotion, compensation, access to training, and termination decisions.

Laureate Education's policies explicitly prohibit discrimination based on race, color, religion, gender, sexual orientation, age, disability, national origin, marital status, veteran status, genetic information, or any other protected status under applicable law. The organization bases all employment decisions on qualifications, experience, and job-related criteria, and does not tolerate any form of discriminatory behavior.

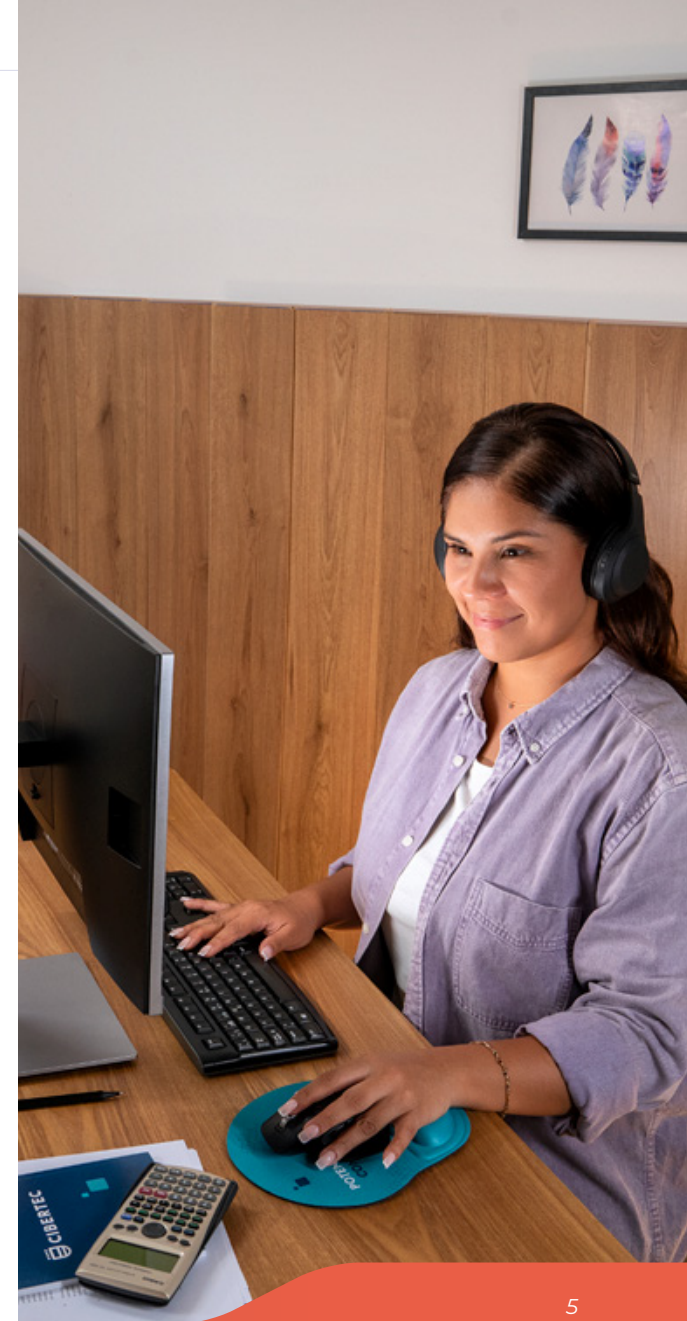


3. Does Laureate Education specify which forms of discrimination it prohibits?

Laureate Education explicitly outlines the forms of discrimination it prohibits across multiple corporate policies and employee-facing documents. Under its policies, the company maintains a zero-tolerance stance toward employment decisions or behaviors based on personal characteristics protected by law.

Laureate Education prohibits discrimination and harassment on the basis of race, color, religion, gender, age, marital status, sexual orientation, national origin, citizenship status, disability, veteran status, gender identity, genetic information (including family medical history), and other protected statuses in the jurisdictions where it operates. These protections extend to hiring, promotions, compensation, training, termination, and all other employment decisions. The applicable policies also provide comprehensive definitions of discrimination, harassment (including sexual harassment), and retaliation, outlining behavioral expectations and reporting procedures for all or employees (including managers) and third parties.

The organization enforces this commitment through required employee training, accessible complaint mechanisms such as the Laureate Ethics Helpline, and dedicated internal resources in Human Resources and Legal. Additionally, the policy affirms that Laureate Education may take action on conduct that violates internal standards, even if it does not constitute a legal violation.



4. Does Laureate Education's supplier policy include references to International Labour Organization (ILO) conventions?

Laureate Education's Code of Conduct and Ethics for Suppliers (Supplier Code), which is available on our website, explicitly aligns with key International Labour Organization (ILO) conventions, including those on forced labor, freedom of association, and collective bargaining. Suppliers are expected to operate in accordance with the ILO's Fundamental Principles and Rights at Work, reinforcing Laureate Education's commitment to upholding global labor standards.

5. Does Laureate Education train all employees on workplace harassment and discrimination?

Laureate Education provides comprehensive training to all employees on workplace harassment and discrimination as part of its Ethics & Compliance program. This training is a critical component of its broader effort to ensure a safe, respectful, and inclusive work environment. The training covers key concepts such as appropriate workplace behavior, how to identify and respond to harassment (including sexual harassment), and the mechanisms available for reporting misconduct, such as the Laureate Ethics Helpline.

Training is mandatory and reinforced through internal campaigns that share real-life case studies and guidance from the Ethics & Compliance Office. These campaigns aim to increase awareness, encourage a culture of accountability, and equip employees with tools to recognize and address inappropriate conduct.

Senior leaders, including the Chief Ethics & Compliance Officer, regularly communicate the importance of completing this training and adhering to Laureate Education's standards of behavior.

6. Does Laureate Education provide corrective or disciplinary action taken in case of discriminatory behavior or harassment?

Laureate Education takes a firm and proactive stance against all forms of discrimination or harassment. The company's policies clearly outline consequences for violations, including corrective or disciplinary action such as termination of employment. These measures apply not only to overt acts of discrimination but also to behaviors that create a hostile, offensive, or intimidating work environment.

Employees are informed that any breach of these standards (whether intentional or due to negligence) is subject to investigation and appropriate sanctions. This commitment to accountability is integral to maintaining a workplace that prioritizes respect, dignity, and inclusion for all employees.

7. Does Laureate Education express an expectation that suppliers adhere to the UN Guiding Principles on Business and Human Rights?

While the UN Guiding Principles are not referenced by name, Laureate Education's Supplier Code sets expectations that align with the UN Guiding Principles framework, including respect for human rights, ethical conduct, and zero tolerance for modern slavery or child labor.



8. Does Laureate Education express an expectation that suppliers respect internationally recognized human rights?

Laureate Education's Supplier Code requires all suppliers to uphold basic human rights and ethical employment practices, including safe working conditions, fair wages, non-discrimination, and protection from abuse.

9. Do Laureate Education's supplier standards include provisions prohibiting the use of forced labor?

Laureate Education's Supplier Code strictly prohibits any form of forced, bonded, or indentured labor in its supply chain. Suppliers must ensure that all employment is voluntary and that no worker is subject to coercion or threat. This requirement is a cornerstone of Laureate Education's responsible sourcing strategy.

10. Do Laureate Education's supplier standards include a commitment to freedom of association and collective bargaining?

Laureate Education expects all suppliers to respect the rights of employees to freely associate, form unions, and engage in collective bargaining. These rights must be upheld (without retaliation or interference), in line with international labor conventions.



11. Do Laureate Education's supplier standards include a commitment to occupational health and safety

Laureate Education's Supplier Code requires suppliers to provide a safe and healthy work environment, comply with all health and safety regulations, and proactively identify and mitigate risks. Laureate Education's expectation is that safety is embedded in daily operations (including training and emergency preparedness), as part of a responsible working environment.

12. Do Laureate Education's supplier standards prohibit corporal punishment or abusive disciplinary practices?

Laureate Education's Supplier Code prohibits any form of corporal punishment, coercion, or degrading treatment. Suppliers must treat all workers with dignity and respect and ensure that disciplinary procedures align with legal and ethical standards.



13. Do Laureate Education's supplier standards prohibit discrimination in employment practices?

In accordance with its Supplier Code, Laureate Education requires suppliers to uphold principles of equal opportunity and non-discrimination. Employment decisions must not be based on race, religion, gender, sexual orientation, disability, or other protected categories, and inclusive employment practices are a fundamental component of Laureate Education's supplier expectations.

14. Do Laureate Education's supplier standards prohibit child labor?

Laureate Education enforces a zero-tolerance policy on child labor. In accordance with Laureate Education's Supplier Code, suppliers must not employ individuals below the minimum legal working age and must avoid sourcing materials produced through child labor. This policy aligns with ILO Conventions 138 and 182.



15. Does Laureate Education disclose a commitment to prohibit the use of forced labor?

Laureate Education publicly commits to eliminating forced labor through its supplier expectations and procurement standards. Laureate Education's Supplier Code provides that suppliers must ensure that employment is voluntary and that grievance mechanisms are accessible and free from reprisal.

16. Does Laureate Education disclose a commitment to prohibit human trafficking?

Laureate Education's Supplier Code requires suppliers to take proactive steps to prevent human trafficking and modern slavery. Any direct or indirect involvement in trafficking practices is grounds for immediate disqualification from the supplier network – a policy that reinforces Laureate Education's zero-tolerance approach.



GOVERNANCE

1. Does Laureate Education provide the right of access, rectification, and deletion of individuals' data?

Laureate Education provides data subjects and authorized third parties with the ability to access, rectify, and manage personal data, in alignment with applicable contractual and legal obligations and its internal policies. These rights are provided in our third-party agreements, supporting full transparency and accountability in personal data processing.

2. Does Laureate Education disclose that both proactive and reactive data protection measures are in place?

Laureate Education maintains a comprehensive data protection framework that includes proactive safeguards, such as employee training, monitoring protocols, and incident management processes. The framework also defines reactive measures, including contingency planning and breach response mechanisms, to ensure timely identification and mitigation of data risks.



3. Are independent audits conducted by Laureate Education at least once every two years – or are regular privacy risk assessments performed on the company’s technologies and practices affecting user data?

Laureate Education has conducted audits, including privacy risk assessments and vulnerability evaluations, at regular intervals. These efforts demonstrate its commitment to maintaining the integrity of its privacy and data protection systems. Technologies and practices affecting user data are regularly evaluated against emerging risks, ensuring proactive compliance and mitigation.

4. Does Laureate Education have a board-level committee responsible for privacy and data security, or governance structures in place for privacy management?

Laureate Education has governance structures in place to oversee privacy and data security risks, which are managed by senior leadership with Board-level oversight.

5. Does Laureate Education rent, sell, or provide personal data to third parties for purposes other than completing transactions or services?

Laureate Education limits data sharing with third parties to purposes explicitly permitted by contractual agreements and applicable law, designed to prevent personal data from being rented, sold, or misused beyond the scope of intended service delivery



6. Does Laureate Education commit to deleting data after a set period, only collect third-party personal data when legally required, and obtain user data lawfully, transparently, and with explicit consent when necessary?

Laureate Education enforces timely destruction of records in accordance with applicable retention policies and is committed to the lawful handling of personal data. This includes responding to legal requests and upholding standards of transparency and consent in data collection, in alignment with applicable law.

7. Does Laureate Education provide regular privacy and data security training to all employees, including contractors?

Laureate Education mandates ongoing security and data privacy training for all users with system access, including contractors. Completion is tracked and enforced by IT security leadership.

8. Does Laureate Education mandate audits of all ethical standard operations at least once every three years?

Laureate Education mandates that its Anti-Corruption Policy be reviewed at least every three years by its Policy Council. In addition, the internal audit function periodically reviews ethics-related procedures to assess their effectiveness and promote consistent implementation across operations. This governance framework is structured to maintain continued alignment with best practices within the evolving regulatory environment.

9. Does Laureate Education provide training programs for all employees – including part-time staff and contractors?

Laureate Education's Ethics and Compliance Program provides a robust training curriculum to all full-time employees, covering topics such as the Code of Conduct, anti-corruption practices, data privacy, conflicts of interest, and harassment prevention, among others. Part-time employees in certain regions also receive training on similar ethics and compliance topics, in alignment with applicable law. These measures reflect the organization's commitment to promoting ethical conduct and regulatory compliance across its workforce, even when delivery methods vary by geography.

10. Does Laureate Education provide formal grievance escalation/reporting (confidential) for human resource-related grievances?

Laureate Education is strongly committed to providing clear, confidential, and accessible channels for employees to raise workplace concerns, including those related to harassment, discrimination, or other forms of misconduct. These channels include reporting to a direct supervisor, Human Resources, or the dedicated Laureate Ethics Helpline, which provides both confidential and anonymous options. Laureate's Code of Conduct & Ethics makes clear that no individual will face retaliation for making a good-faith report, a commitment Laureate Education reinforces through its Ethics & Compliance communications.

The organization's approach is designed to empower its employees to speak up when they witness or experience behavior that violates company standards, without fear of negative consequences. This commitment to proactive issue resolution and respectful engagement is fundamental to Laureate Education's workplace culture and supports the broader values of inclusiveness and integrity.

11. Are Laureate Education's charitable contributions and sponsorships governed and publicly disclosed?

Laureate Education has a formal internal policy that governs charitable contributions and sponsorships. This includes a thorough review and approval process intended to ensure that donations are ethical, transparent, and aligned with Laureate Education's mission. While there is no public disclosure of charitable contributions, the internal framework demonstrates careful oversight, reinforcing accountability for these transactions, where appropriate due diligence is required and charitable contributions that meet certain thresholds will trigger additional approval requirements by Laureate Education's Chief Legal Officer or Chief Ethics & Compliance Officer.



