

Code of Conduct and Ethics for Suppliers



Laureate is committed to acting honestly and ethically. We expect the same of our suppliers. The Laureate Code of Conduct and Ethics establishes principles of appropriate behavior and ethical conduct for Laureate employees. This Code of Conduct and Ethics for Suppliers sets similar standards for our suppliers.

Acting ethically and in accordance with the law is at the very core of who we are. Maintaining our integrity and, adhering to our principles have earned the trust of our students and their families, our partners, our communities, and each other. This trust and goodwill constitute some of our greatest assets, so maintaining our ethical culture is the job of everyone at Laureate.

- **Records and Reporting**

Suppliers must keep accurate records of all matters related to their business with Laureate, including the proper recording of all expenses and payments. If Laureate is being charged for a supplier employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period

- **Assets and Information**

Suppliers should protect Laureate's assets and information. Suppliers who have been given access to Laureate's assets, whether tangible or intangible, should use them only within the scope of the permission granted by Laureate and for the purposes of the engagement with Laureate. Suppliers who have been given access to Laureate's confidential information should not share this information with anyone unless authorized to do so by Laureate and should not use this information to trade in securities. If a supplier believes it has been given access to Laureate's confidential information in error, the supplier should immediately notify its contact at Laureate and refrain from further distribution of the information.

Suppliers should not share with anyone at Laureate information related to any other person or organization if the supplier is under a contractual or legal obligation not to share the information.

- **Health and Safety**

We expect our suppliers to adhere to occupational health and safety, working hours, wages, and benefits laws and regulations. Suppliers should proactively identify and address potential health and safety risks in the workplace, implementing appropriate programs to promote employee well-being.

Suppliers shall not tolerate any instance of harsh and inhumane treatment including but, not limited to, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, including the threat of any such treatment.

Code of Conduct and Ethics for Suppliers



- **Bribery and Corruption**

Bribery is a form of corruption where cash or any other gift of value is offered to government/public official or any other person with the intent to obtain or retain business or gain an improper advantage. Corruption is defined broadly as ‘the abuse of power for personal gain’.

Laureate has a zero-tolerance policy for making or accepting bribes or kickbacks. In connection with any transaction as a supplier to Laureate, or that otherwise involves Laureate, suppliers must not transfer anything of value, directly or indirectly, to anyone, including government officials, employees of government-controlled entities, or employees of Laureate or any other organization, in order to obtain any improper benefit or advantage. Suppliers acting on behalf of Laureate must comply with all applicable laws dealing with bribery. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment, or anything else of value) made on behalf of Laureate, or out of funds provided by Laureate. Suppliers must furnish a copy of this accounting to Laureate upon request.

- **Gifts, Meals, Entertainment, and Other Business Courtesies**

Laureate employees may exchange gifts, meals, entertainment, and other business courtesies with suppliers only if they are reasonable, infrequent, and modest in amount, as well as consistent with local law, custom, and practice. In some instances, Laureate employees may be subject to monetary limitations on the value of such business courtesies that may be given or received. In all cases, Laureate employees must never offer or accept such courtesies under circumstances where they could affect, or appear to affect, decision making. And they must never give or receive cash. We expect our suppliers to respect these restrictions.

- **Modern Human Slavery, Child, or Forced Labor**

Laureate is unwavering in its commitment to protect and advance human rights, and has zero-tolerance for child and forced labor, slavery, and human trafficking. All suppliers working with Laureate are expected to uphold this commitment. Specifically, Laureate requires that suppliers refrain from employing children or using forced labor. Additionally, they must not purchase supplies or materials produced through any form of child or forced labor. All labor practices must align with the International Labour Organization’s (ILO’s) conventions on forced labor and the abolition of forced labor.

Code of Conduct and Ethics for Suppliers



- **Conflicts of Interest**

A conflict of interest arises when our personal activities and relationships interfere, or appear to interfere, with our ability to act in the best interest of Laureate. Acting to further personal interests when those interests conflict with Laureate's can harm the organization. Even the appearance of a conflict may cause others to doubt our fairness. Laureate employees should act in the best interest of Laureate when conducting Laureate business.

They should have no relationship, financial, or otherwise, with any supplier that might conflict, or appear to conflict, with their obligation to act in the best interest of Laureate. Suppliers should have no financial relationship with any Laureate employee with whom the supplier may interact as part of their engagement with Laureate. Suppliers should take care that any personal relationship with a Laureate employee is not used to influence the Laureate employee's business judgment. If a supplier has a family or other relationship with a Laureate employee that might represent a conflict of interest, the supplier should disclose this fact to Laureate or ensure that the Laureate employee does so.

- **Freedom of Association and Collective Bargaining**

We expect our suppliers to recognize and respect the rights of employees to associate freely and bargain collectively, including the rights set forth in the National Labor Relations Act or other applicable labor relations laws. Also respect the rights of individuals to freely associate, form, and join trade unions and engage in collective bargaining, as identified by the ILO in the Fundamental Principles and Rights at Work.

- **Non-Discrimination**

Suppliers must not discriminate in hiring or employment practices based on protected criteria, including pregnancy, race, religion, disability, and sexual orientation. Upholding employee dignity, suppliers should establish a positive work culture that values all employees. Discrimination or harassment based on various protected statuses is strictly prohibited, and suppliers must comply with relevant laws.

- **Speaking Up**

Suppliers who believe that a Laureate employee, or anyone acting on behalf of Laureate, has engaged in illegal or improper conduct, should report the matter to Laureate. Suppliers can contact Laureate ethics and compliance personnel at compliance@laureate.net or use the Laureate Ethics Helpline at www.laureateethics.ethicspoint.com. Laureate takes all reports of possible misconduct seriously and will investigate. Prompt reporting when we suspect a Code violation is vital to ensuring a thorough investigation and timely resolution. A supplier's relationship with Laureate will not be affected by an honest report of potential misconduct.

Policy last updated on December, 2024