



## **BUSINESS PARTNER CODE OF CONDUCT**

Effective October 1, 2020

FullBloom and its operating divisions, Catapult Learning, Specialized Education Services and Little Leaves (collectively, “FullBloom” or the “Company”), strive to deliver educational and behavioral health services compassionately and to act with absolute integrity in the way we do our work and the way we live our lives. Our Mission and our Core Five Values are incorporated into our daily activities and support our tradition of caring – for our customers, clients, our communities, and our colleagues. We strive to deliver educational and behavioral health services compassionately and to act with absolute integrity in the way we do our work and the way we live our lives.

We believe that what we do is just as important as how we do it. Across our divisions, we are fully committed to complying with applicable law and upholding the highest standards of business conduct everywhere we do business. Among other things, we strive to recognize and promote basic human rights and appropriate labor standards, honest and ethical business practices, and a safe, healthful, and sustainable environment for workers and the general public. And this commitment does not end with us; we expect all companies and individuals with whom we do business to do the same.

We count on each of our business partners – our suppliers, customers, vendors, agents, and other third parties (each, a “business partner” and collectively, “business partners”)– to adhere to the values and principles set forth in this Business Partner Code of Conduct (“Code”).

Failure to conform to this Code may be sufficient cause to exercise our right to revoke a business partner’s “approved” status. Unless prohibited by agreement, we also reserve the right, as a condition of business partners’ approval, to conduct periodic unannounced audit inspections of our business partners’ associates, their facilities and practices to verify compliance with this Code.

If we determine that any business partner has violated this Code, we may either terminate our relationship or require our business partner to implement a corrective action plan. If corrective action is advised but not taken, we may suspend placement of future orders and may terminate a current contract.

Our business partners are expected to cooperate fully and to provide us or our representatives or agents with all information requested that is necessary to demonstrate compliance with this Code.

### ***Our Standards and Expectations***

Accuracy of Business Partner Records. We expect our business partners to use good judgment and common sense when preparing any reports, business correspondence, proposals, or any other business documents for us. All business documents must be clear, accurate, complete, and honest. This includes, but is not limited to financial reports, proposals, product literature, invoices, shipping documents, and all other business-related documents.

Confidential Information. We expect our business partners to treat all information received from FullBloom as confidential and to take every precaution to safeguard such information. Our business partners should use the same measures, but not less than reasonable care, to ensure the protection of FullBloom’s sensitive information as they would use to protect their own. No disclosure of confidential information is permitted

except as required by law or for the performance required of the business partners under their agreements with FullBloom.

Conflicts of Interest. We expect our business partners to avoid potential and actual conflicts of interests. Our business partners and their representatives shall not deal directly with any FullBloom employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the business partner. We expect that business partners will not deal directly with a spouse, domestic partner, or other family member or relative who is employed by FullBloom in the course of negotiating contracts with or performing obligations for FullBloom.

Freedom of Association and Collective Bargaining. We expect our business partners to recognize and respect the rights of employees to associate freely and bargain collectively including, if applicable, the rights set forth in the National Labor Relations Act or other such labor relations laws as may be applicable.

Gifts and Entertainment. FullBloom employees are discouraged from receiving gifts under FullBloom's gifts and entertainment policies because it may pose an actual or potential conflict of interest. FullBloom employees may only accept gifts of nominal value (less than \$50.00), or gifts that are otherwise reasonable and not intended to (or risk being perceived by others as intending to) influence business decisions. Our employees are instructed to notify the FullBloom Vice President, Corporate Compliance if they receive gifts that exceed our guidelines.

Data Privacy. We expect our business partners to manage all sensitive information and personal information in full compliance with data privacy laws and ensure that proper protocols are followed in the event of a breach.

Discrimination. We expect our business partners to avoid employment discrimination, including improper hiring, salary, benefits, advancement, discipline, termination, or retirement practices, whether on the basis of the employee's race, gender, color, religion, nationality, ethnic or social origin, age, disability, marital status, reproductive or familial situation, height, weight, sexual orientation or political beliefs.

Environmental Protection. We expect our business partners to use environmentally responsible practices and production methods that meet well-established certification standards. Business partners should strive to minimize waste products, use post-consumer recycled materials in the production of finished products and enhance the recyclability, energy efficiency, durability, biodegradability and repair ability of the products we purchase.

Foreign Law. We expect our business partners and their employees, agents and subcontractors to comply with all foreign laws related to the topics covered in this Code, unless local law conflicts with, or supersedes, this Code.

Harassment or Abuse. We expect our business partners to treat their employees with dignity and respect. Business partners shall not subject employees to any physical, sexual, psychological, or verbal harassment or abuse. Business partners shall not use or tolerate any form of corporal punishment.

Health and Safety. We expect our business partners to provide a healthy and safe working environment to prevent accidents and injury to health of employees or others relating to the operation of their facilities. Business partners' products, services, use of equipment, working conditions, employee training and licensing requirements, and activities performed by the business partner or its subcontractors shall be in full compliance with the Federal Occupational Safety and Health Act, and all other applicable federal, state and local laws, rules, regulations, and ordinances.

Legal and Regulatory Compliance Practices. We expect our business partners to conduct business in full compliance with all domestic and international laws and regulations. In addition to any specific obligations under contracts with FullBloom, we expect our business partners:

- To comply with all applicable trade control laws and all export and import restrictions and requirements
- To conduct business in full compliance with all applicable antitrust and fair competition laws
- To comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials
- To be honest, direct, and truthful in discussions with regulatory agency representatives and government officials
- To refrain from participating in international boycotts that are not sanctioned by the U.S. government or applicable laws
- To comply with all applicable anti-corruption laws and avoid any direct or indirect payments or promises of payments to foreign government officials for the purpose of inducing the individual to misuse his/her position to obtain or retain business.

Wage, Hours, Leaves, Child Labor Laws and Human Trafficking. We expect our business partners to recognize and respect the legal rights of employees concerning minimum and prevailing wages and wage payments. Business partners should provide wages and benefits that meet or exceed the requirements of local law. At a minimum, business partners should pay workers regularly and timely, the legal minimum wage or the wage negotiated in an applicable collective agreement, whichever is higher. All other types of legally mandated benefits must be provided as required by law, including, as applicable, paid leave, pension, statutory insurance, health benefits, maternity leave, parental leave, family care leave, and childcare benefits. All overtime work must be performed and compensated in accordance with the law and the individual's employment contract or other applicable contract or collective agreement.

Workers should not be required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week. Workers shall be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include, for example, holidays, maternity/parental leave, family care leave and sick leave.

FullBloom does not tolerate slavery, forced labor, or human trafficking in any form and FullBloom will not knowingly work with business partners who engage in these practices or permit their subcontractors to engage in these practices. Additionally, business partners must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains

Business partners must not employ child labor and should take the necessary preventive measures to ensure that it does not employ anyone under the applicable legal minimum age of employment. Such measures include age verification systems, training for managers, and communicating with subcontractors and suppliers on child labor issues.

We expect business partners to respect workers' rights to freedom of association by meeting or exceeding the relevant requirements of local law.

Compliance Procedures. FullBloom is committed to conducting business in full compliance with applicable law and in line with the highest standards of ethical conduct. We are also committed to fostering a workplace where our employees are comfortable bringing forward legal, compliance, and ethics questions and concerns in good faith, without fear of retaliation. As such, our employees are asked to report any suspected wrongdoing by our business partners. At the same time, as a business partner of FullBloom, you are encouraged to report any conduct that you believe to be unethical or in violation of the law or our policies related to your dealings with FullBloom. While speaking with your primary FullBloom point of contact is usually a good place to start if you have a concern, you should contact either FullBloom's Vice President, Corporate Compliance or FullBloom's General Counsel at the main office number at (800) 841-8730 or reach out to the Compliance and Ethics Hotline at (888) 420-7636 or <https://reportanissue.com/fullbloom/welcome>.

You may choose to remain anonymous when reporting a violation by calling the Compliance and Ethics Hotline. All reported violations that include specific details of the violation will be investigated promptly and fairly to ensure the appropriate action is taken.