

Supplier Code of Conduct

This Supplier Code of Conduct articulates EBSCO Information Service's (EBSCO) expectations of the conduct of suppliers and business partners doing business with EBSCO (suppliers). Suppliers are expected to understand and act consistent with EBSCO's approach to integrity, responsible sourcing, and supply chain management. EBSCO expects that its suppliers will cascade similar expectations through their own supply chains. EBSCO expects to do business with suppliers that meet our standards and behave consistent with, and positively reflect, EBSCO's values throughout the supply chain. EBSCO chooses its suppliers carefully, and expects that they will satisfy contractual requirements, comply with laws and regulations, and act in a way consistent with the principles and values of this Supplier Code of Conduct.

HUMAN RIGHTS

Forced Labor Trust

Suppliers will not use slave, prisoner or any other form of forced or involuntary labor. Suppliers must take reasonable measures to ensure that all of their employees understand the terms of their employment.

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Child Labor

Suppliers will not use child labor. EBSCO has a zero-tolerance policy regarding the employment of children where the age of employment is not in accordance with applicable laws.

Human Trafficking

Suppliers will not engage, directly or indirectly, in human trafficking. EBSCO prohibits human trafficking abuses. This means that suppliers may not recruit, transport, transfer, harbor or receive persons, by means of the threat or use of force, coercion or other means, for the purpose of exploiting them.

Conditions of Employment

Suppliers will comply with applicable laws regulating work hours, wages, overtime and benefits. Employees must be paid in a timely fashion that meets or exceeds legal minimum standards.

Harassment and Discrimination

Suppliers will not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. Harassment or discrimination of any kind will not be tolerated.

Freedom of Association and Collective Bargaining

Suppliers will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining.

Freedom of Movement

Suppliers allow workers to terminate their own employment at any time. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. Suppliers shall not withhold, or keep in their possession, any workers documents or items, including passports,

identity papers, jewelry, ATM cards, or land deeds, as a means to bind them to employment or to restrict their freedom of movement.

HEALTH AND SAFETY

Workplace

Suppliers will provide clean, healthy and safe environments for their employees that meet or exceed legal standards. Suppliers will have safety and training procedures for their employees to prevent work-related accidents and occupational illnesses. Suppliers' employees will have the right to refuse work and report any conditions that do not meet these criteria.

ENVIRONMENT

Operation of Suppliers' Facilities

Suppliers shall operate their facilities in compliance with all applicable environmental laws, including laws and international treaties relating to: permitting; waste disposal; emissions; discharges; and hazardous and toxic material handling.

Inputs and Components

Suppliers must ensure that the goods that they manufacture (including the inputs and components that they incorporate into their goods) and provide to EBSCO comply with all applicable environmental laws and treaties. Suppliers must ensure that they will only use packaging materials that comply with all applicable environmental laws and treaties.

LEGAL COMPLIANCE AND BUSINESS INTEGRITY

Compliance with Law

Suppliers must comply with all applicable laws and regulations in their country of operation.

Anti-Corruption/Anti-Bribery

Suppliers will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties. Suppliers must comply with EBSCO's Anti-Corruption policy available at www.ebsco.com/about/responsibility.

Ethical Behavior

Suppliers will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable laws, including those laws pertaining to: (i) anti-competitive business practices, (ii) respect for and protection of intellectual property, company and personal data, (iii) export controls and (iv) economic sanctions.

Confidential Information

Suppliers are expected to respect intellectual property rights, data privacy standards and to take appropriate steps to safeguard any personal, proprietary or confidential information received from EBSCO.

Reporting and Non-Retaliation

Suppliers will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation. Suppliers will also appropriately investigate reports and take corrective action, if needed. Suppliers will prohibit retaliation.

Verification and Compliance

Suppliers will communicate these or substantially similar codes to their suppliers and subcontractors. Suppliers will develop and implement appropriate internal business processes and policies to ensure compliance with applicable laws and this Supplier Code of Conduct. Suppliers will be able to demonstrate compliance with this Code upon our request and will take any action to correct any non-compliance.

Reporting Integrity Concerns to EBSCO

Subject to any restriction posed by law, suppliers will promptly inform EBSCO of any concern related to issues governed by this Supplier Code of Conduct. To report a concern or submit questions, suppliers can always speak directly to their EBSCO representative or report to EBSCO's ethical reporting hotline available at ebscointegrity.com.

Suppliers shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Supplier Code of Conduct.

Enforcement

In case of non-compliance, corrective actions will be set forth, in order to comply with applicable laws and regulations. EBSCO reserves the right to terminate its business relationship with suppliers who are unwilling to comply with this Supplier Code of Conduct.