

INFINITAS LEARNING - CODE OF CONDUCT FOR SUPPLIERS AND OTHER BUSINESS PARTNERS

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Document History

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Introduction

(i) Policy Statement

Infinitas Learning is dedicated to maintaining the highest standards of integrity and ethical conduct in all aspects of our business. We believe that our success is built on a foundation of trust, respect, and mutual benefit with our suppliers and other business partners, hereinafter together referred to as “**business partners**”. This code of conduct for suppliers and other business partners, hereinafter referred to as the “**Code**”, reflects our commitment to these values and outlines our expectations for ethical behaviour, legal compliance, and social responsibility from all parties we engage with. By adhering to this Code, our business partners play an essential role in upholding the reputation and values of Infinitas Learning, contributing to a sustainable and equitable business environment.

(ii) Scope

This Code applies to all business partners of Infinitas Learning. The Code outlines the standards and expectations for behaviour and practices, ensuring alignment with Infinitas Learning’s values and ethical guidelines. It is applicable globally, across all regions and jurisdictions where Infinitas Learning operates, and is intended to guide our business partners in fostering responsible business practices that support our shared goals.

(iii) Purpose

The purpose of this Code is to establish clear expectations for ethical, legal, and socially responsible behaviour from our business partners. It serves as a framework to guide our business partners in aligning their operations with the values and principles upheld by Infinitas Learning. By adhering to this Code, our business partners help us achieve our mission of delivering high-quality educational resources while promoting a sustainable, inclusive, and fair business environment.

1. Respecting one another

1.1 Inclusivity, diversity and equality

Business partners are required to maintain a workplace which is professional and welcomes diversity and inclusivity. Business partners must treat every individual they interact with, including employees of Infinitas Learning, with respect. In an inclusive working environment, all employees can thrive, regardless of their age, life stage, job tenure, gender or origin. Whereas diversity is about the differences between individuals in terms of gender, age, ethnicity, religion, disability, etc., inclusion is about navigating these differences. We see inclusion as the foundation for the success of diversity initiatives. Equal treatment means that individuals are appreciated for their talents and receive equal opportunities.

1.2 Health and safety at work

Business partners must provide a safe and healthy workplace for their employees. Business partners are required to take responsibility, in compliance with relevant laws and regulations, to protect employees' health and welfare and to implement a health and safety management system aligned with recognized international standards. Partners shall seek to prevent work-related illnesses (physical or mental) and accidents and to reduce health and safety related risks.

1.3 Prohibition of harassment

Infinitas Learning believes everyone must be treated with respect and fairness, hence it has a zero-tolerance for any form of harassment. We expect our business partners to uphold the same standards. This means that business partners shall not tolerate any type of harassment, including physical, sexual, verbal, psychological harassment as well as other misconduct such as mobbing, bullying, abuse or threats. We require our partners to facilitate and encourage reporting of harassment or other inappropriate behaviors in the workplace.

2. Acting fairly and responsibly

2.1 Fair competition

Infinitas Learning is committed to compete by fair means on all relevant factors such as price, quality and service, respecting the rules and principles defined regarding these issues. We seek to establish mutually beneficial and healthy relationships with responsible business partners. We treat business partners based on objective criteria such as price and quality and on intangible criteria including their integrity and reliability.

Business partners shall conduct their business in full compliance with antitrust and fair competition laws prohibiting anti-competitive practices and the abuse of a dominant market position. They must refrain from collusion and other anti-competitive behavior. This includes avoiding price-fixing agreements and the passing on of insider information, such as strategic goals, costs and supplier lists, to other parties.

2.2 Anti-corruption

Infinitas Learning has a zero-tolerance policy on bribery and any other form of corruption within our business. Our business partners must comply with anti-bribery laws and refrain from engaging in any conduct that would put our organization at risk of violating anti-bribery laws. We will not tolerate any attempt of a partner to gain or retain business or to influence third parties or officials by illegitimate means. We do not accept bribes nor do we use bribes to acquire or retain business. Our business partners may not (attempt to) obtain a personal benefit, business advantage or further the relationship with Infinitas Learning or any other party through improper or illegal means. Partners shall refrain from operating in legal grey areas and from using or accepting illegal funds.

2.3 Insider trading

Business partners shall refrain from engaging in the unlawful practice of insider trading, meaning they shall not buy or sell publicly traded securities or financial instruments based on non-public information or otherwise use insider information for unfair advantages in the stock or securities market.

2.4 Money laundering and terrorist financing

Business partners shall demonstrate commitment to maintain the highest ethical standards in their business operations. Infinitas Learning does not facilitate money laundering and does not conduct business with sanctioned parties. We do not tolerate our business to be used by business partners for the purposes of money laundering, terrorist financing or any other criminal activities. Moreover, we expect our business partners to avoid doing business with entities, governments, countries or persons, that violate applicable (economic) sanctions. The above implies that it is important for us to know our business partners, in order to prevent any violation of anti-money laundering laws or sanctions. In addition, partners shall encourage individuals within their organization to speak up in case of concerns about money laundering or other violations.

2.5 Sustainability and environment

Infinitas Learning is committed to environmental stewardship, and actively works to decrease its environmental footprint through sustainable business practices, for example by investing in creating sustainable products, responsible material sourcing, and aiming for carbon neutrality in its operations by 2030. We expect our business partners to work with us to achieve our sustainability goals and minimize the environmental impact of our business as far as possible and to promote environmental

sustainability. Business partners must demonstrate efforts to conduct business in an environmentally responsible way.

2.6 Social responsibility

We firmly oppose any illegal or inhumane labour practices and hold our partners to the same high standards. Our business partners shall abide by applicable labour laws, employment standards and human rights legislation. In all interactions with any person or business, partners shall have the utmost respect for personal dignity, privacy, and individual rights. We require our partners to adhere to the general provisions of the UN Universal Declaration of Human Rights and the Conventions of the International Labour Organisation (ILO). Specifically:

- all forms of child labor shall be unequivocally avoided;
- the laws governing human rights, fair working conditions, statutory minimum wages, and other labor-related regulations shall be diligently adhered to;
- both international and local laws and regulations shall be fully complied with.

2.7 Quality of products and services

Our stated aim is to deliver the quality that our customers seek, and this is something we also expect from our vendors. We have a responsibility to our customers and users, and provide them with high quality products and services. We expect our business partners to observe relevant applicable standards and legal requirements when producing products and services supplied to us.

3. Protecting company assets, intellectual property, personal data and (other) confidential information

Infinitas Learning respects the property rights of third parties and operates checks and balances to reduce the risk that infringement of intellectual or other property rights takes place. Accordingly, we expect business partners to respect our intellectual property rights and other company property.

3.1 Intellectual property rights

Our business partners shall respect and protect the intellectual property rights of others, such as authorships, copyrights, proprietary information, patents, trademarks, designs or trade secrets in accordance with applicable laws. The status of intellectual property rights related to texts, images or other content supplied to us must be secured.

3.2 Confidential Information

Business partners must take appropriate measures to safeguard and maintain confidential and proprietary information of Infinitas Learning and may use such information only for the purposes specified by Infinitas Learning. Confidential information includes, without limitation, all strategic, financial, technical or business information not in the public sphere. Business partners must take efforts to ensure that such information is protected against any unauthorized use and against access by outsiders.

3.3 Privacy and Information Security

Business partners shall commit to protect personal data obtained through their relationship with Infinitas Learning or others they do business with, including personal data of suppliers, customers, consumers and employees. Personal data must be handled with utmost care and for legitimate purposes only. When collecting, storing, processing, transmitting and sharing personal data, business partners shall comply with all applicable privacy and information security laws and regulations.

Business partners must store information as agreed with Infinitas and have appropriate information security policies and procedures in place to secure access to our information.

Business partners must notify us promptly of actual or suspected privacy breaches, security breaches, or losses of our information.

4. Avoiding conflicts of interest

4.1 Transparency about conflicts of interest

We seek to prevent conflicts of interest that might compromise sound business judgment. Business partners must avoid actual, potential or perceived conflicts of interest with Infinitas Learning's employees. If these occur, a business partner must disclose such a conflict in an open and transparent manner, so that appropriate steps can be taken to manage the situation.

4.2 Responsible procurement

Our business partners throughout the value chain play a crucial role for us. Acting together, we conclude fair agreements and our business partners may not coerce or use inappropriate means to force us to accept their terms. We maintain an arm's-length relationship with our business partners.

4.3 Gifts, hospitality and entertainment

In their relationship with our employees, business partners may not try to gain improper advantage or preferential treatment by offering lavish gifts, hospitality or entertainment. Our business partners are only permitted to give or accept gifts or invitations if these are occasional gifts or invitations of appropriate value, or if this is part of standard business practice and appropriate to the individuals involved. However, this applies provided that no laws are breached in the process and it is possible to rule out any influence being exerted on the decisions of Infinitas Learning or any other business relationship or public authority.

5. Expecting business partners to take their responsibility

Infinitas Learning expects its business partners to take their responsibility, which is laid down in this Code, except if there is a legal obligation for business partners to adhere to a different code of conduct.

If the principles of these other codes of conduct are in line with the principles defined in this Code, Infinitas Learning does not oppose adhering to such documents.

6. Adhering to this Code

We do not only expect business partners to adhere to this Code, but also require reporting of possible violations of this Code or the law should these become known to a business partner. If a business partner raises a concern in good faith, such partner will be defended and protected from any form of retaliation.

A violation of the law, the Code or any of our policies can have serious consequences for Infinitas Learning and the individuals involved. The same goes for turning a blind eye to any such violation. If a business partner fails to meet its obligations arising from this Code (including turning a blind eye to such violations), any of our policies or the law we reserve the right to assert our legal rights in accordance with the contractual provisions and/ or in accordance with this Code. The failure to comply with this Code, the law or any of our policies can result in termination of the partnership.