



# Code of Business Ethics

## OUR COMMITMENT

Vanta Education is proud to have made quality education accessible to hundreds of thousands of students worldwide. We strive to enhance the lives of students through their preferred institutions and execute on this with a talented, multi-national staff of experienced professionals.

Our success is a direct reflection of the caliber of people at our institutions, who work tirelessly to bring higher education to students around the world. We are equally proud of our students, the sacrifices they make and the dedication they demonstrate every day in their journey toward an education and a better life.

We at Vanta Education hold ourselves accountable to our students, faculty, each other and society through our uncompromising commitment to the preservation of our ethical principles and honesty in all of our interactions. We conduct ourselves with integrity and remain committed and respectful in our personal and corporate responsibilities.

We expect that all of our Vanta Education community members will support our ethical culture by acting with integrity, modeling our values, and reporting concerns or questions as they arise. We are committed to protecting members of the Vanta Education community from retaliation including when they report concerns or participate in investigations. We expect that individuals who report concerns do so in good faith and with a legitimate interest in ethics and compliance at Vanta Education. Vanta Education, in turn, will thoroughly and promptly review reported issues to ensure the ongoing excellence and strength of our company and its ethics and compliance program.

As everyone at Vanta Education continues to focus on inspiring and empowering those pursuing higher education, we will hold to our core values and principles of ethical behavior.

Accordingly, we publicly share the Vanta Education Code of Business Ethics, and declare our commitment to operating in accordance with its principles.

Sincerely,

Gregory W. Cappelli  
Executive Chairman

Matthew R. Henriksen  
General Counsel and Chief Compliance Officer

## TABLE OF CONTENTS

Section 1: Ethics at Vanta Education.....	4
Our Mission.....	4
Code of Business Ethics.....	4
Our Ethical Principles.....	4
Section 2: Commitments.....	4
Corporate Governance.....	4
Applicability of the Code.....	5
Section 3: Personal Responsibility.....	5
Conflicts of Interest and Corporate Opportunities.....	5
Outside Employment and Boards of Directors.....	6
Communications with Fellow Employees, Students, the Public and Others.....	6
Use of Vanta Education Resources.....	6
Gifts and Entertainment.....	7
Section 4: Honesty.....	7
Fair Competition.....	7
Fair Dealing.....	8
Disclosures by the Company.....	8
Section 5: Corporate Citizenship.....	9
Charitable Contributions.....	9
Sustainability.....	9
Lobbying and Political Contributions.....	9
Section 6: Integrity.....	10
Anti-Corruption and Anti-Bribery.....	10
Integrity of Commercial Transactions.....	11
International Trade Laws.....	11
Section 7: Business Excellence.....	11
Records Management.....	11
Accounting Practices.....	11
Sourcing Integrity, False Claims and Government Contracts.....	12
Education Regulations.....	12
Privacy.....	12
Section 8: Respect.....	13
Confidentiality and Intellectual Property.....	13
Our Labor Practices.....	14
Diversity.....	14
Workplace Safety.....	14
Workplace Violence.....	14
Equal Opportunity, Discrimination and Harassment.....	14
Non-Retaliation.....	15

Section 9: Assistance and Reporting Concerns; Investigations.....	15
Asking Questions or Reporting Concerns.....	15
Enforcement.....	16
Investigations and Audits.....	16

## **Section 1: Ethics at Vanta Education**

### **OUR MISSION**

Our goal is to improve and broaden educational options and access for students on an international scale, and to produce career-ready graduates. Our institutions take pride in preparing their students for success in a diverse marketplace, and in partnering with industry to ensure educational outcomes that meet employer demands. We strive to enhance the lives of students through their preferred institutions and execute on this with a talented, multi-national staff of experienced professionals.

### **CODE OF BUSINESS ETHICS**

The Vanta Education Code of Business Ethics (the “Code”) expresses the ethical principles, expectations and standards we set for ourselves. The Code guides our decision-making processes and shapes our approach to our work. It describes the standards and behaviors that govern Vanta Education’s business dealings and interactions with others.

The Code portrays Vanta Education’s character as a company and of its employees. The Code represents the commitment to ethical leadership of Vanta Education, our leaders and each of our employees. We are all dedicated to the Code and its principles. While the Code does not address all situations that we may encounter, it serves as a resource and a guide.

### **OUR ETHICAL PRINCIPLES**

*These are the ethical principles that define our ethical culture and that distinguish us globally.*

- We conduct ourselves with honesty, integrity and the highest ethical standards.
- We seek out and embrace diversity, valuing differences in people, perspectives and experiences.
- We invest in ourselves and our organization through our individual and collective dedication.
- We contribute to the communities in which we work and live by being good global, corporate and individual citizens.
- We abide by and comply with the laws, regulations and rules that govern us wherever we operate in the world.
- We believe that the way we do our business is as important as the business results we achieve.
- We celebrate and reward our successes and encourage and support each other.

## **Section 2: Commitments**

### **CORPORATE GOVERNANCE**

Vanta Education is committed to good corporate governance practices. The Vanta Education Board of Directors is highly engaged and focused on the core governance principles of ethical leadership, transparency, oversight and accountability. The Vanta Education Board executes its governance function with the highest standard of care and acts in the best interest of Vanta Education and its stakeholders.

Vanta Education’s management is expected to model our core values, mentor others and further a culture of ethical conduct in the workplace through their words and actions. Management is responsible for establishing an appropriate system of internal controls to ensure process efficiency, accuracy and timeliness of company transactions and financial information. Management is also responsible for ensuring that all of

our employees understand their requirement to comply with laws and regulations and to prevent fraud and abuse of company resources. Additionally, our management is responsible for understanding the risks to us and our stakeholders and taking necessary action to mitigate these risks.

Vanta Education's Chief Compliance Officer, supported by the Vanta Education Legal and Compliance Department and local compliance officers at each of our institutions, is responsible for leading the ethics and compliance program for our organization and supporting our values, ethical principles and compliance obligations.

## **APPLICABILITY OF THE CODE**

For purpose of this Code, "Vanta" means Vanta Education. References to the "organization" means Vanta Education and all of its subsidiaries and affiliates around the world (together "Vanta Education").

All employees, officers and directors of Vanta Education are expected to respect, promote and comply with this Code. Each of our operating subsidiaries has established their own Code of Business Ethics that is consistent with this Code.

Outside consultants, contractors, vendors and agents hired by Vanta Education are expected to abide by the principles and values set forth in the Code when performing services for or on behalf of Vanta Education.

Vanta Education has affiliates in several countries and is subject to the laws of several countries. Accordingly, we comply with the strictest law that governs our operations. In cases where laws may create conflicting legal obligations, individuals should contact the Vanta Education Legal and Compliance Department for assistance.

## **Section 3: Personal Responsibility**

### **CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES**

Vanta Education community members have a duty of loyalty to Vanta Education which includes avoiding situations that may create, involve or give the appearance of a conflict of interest. Vanta Education community members are expected to act in the best interest of Vanta Education, disclose and resolve any potential conflicts of interest in advance and use of company information and assets to benefit the organization, our customers and our shareholders.

A conflict of interest could occur when:

- Personal interests conflict with the interests of the organization.
- Personal interests interfere or could interfere with the performance of duties.
- Employees may not be effective or objective in their company duties due to personal interests.
- Employees use the organization's information, assets or their position or influence at the organization for personal gain.
- An employee's outside employment or the employment of an immediate family member creates a conflict of interest or the appearance of a conflict of interest.
- There is the appearance of a conflict of interest.

*Conflicts, potential conflicts, and business opportunities that are encountered through the course of an employee's work or position must be disclosed for review and advice. These issues will be reviewed by the*

*Vanta Education Legal and Compliance Department of your local compliance officer, as applicable, who will advise on the potential conflict of interest, appropriate resolution and expectations.*

## OUTSIDE EMPLOYMENT AND BOARDS OF DIRECTORS

Vanta Education expects that each employee's loyalty is to Vanta Education and any outside employment opportunities do not interfere or conflict with that commitment, including the use of company time, resources, or assets.

External work opportunities may present issues and situations that could be a conflict of interest. Additional opportunities may create conflicts include serving as an executive or director of another company or entity.

*These types of external or additional work opportunities must be disclosed in the same manner as other potential conflicts of interest for review and advice in advance of accepting a position. Additional information on conflicts of interest, outside employment, and service on boards of directors is available to contacting the Vanta Education Legal and Compliance Department.*

*When you submit a disclosure, such as a request to engage in outside employment, the disclosure is reviewed by your local compliance officer or the Vanta Education Legal and Compliance Department, as applicable, and if a potential conflict of interest exists, certain limitations on your outside employment activities may be imposed to ensure that the organization's interests, and yours, are protected. If you need help in determining whether or not you have a conflict of interest, or how to go about disclosing a conflict, you may contact your local compliance officer, the Vanta Education Legal and Compliance Department, or request assistance through the Vanta Education Ethics Helpline.*

## COMMUNICATIONS WITH FELLOW EMPLOYEES, STUDENTS, THE PUBLIC AND OTHERS

In the business, social and classroom environments, each of us acts as a representative of Vanta Education. Employees are expected to demonstrate our values, professionalism and discretion in all of these interactions. This means that we are fair, honest and thoughtful in all our business activities and communications. We are transparent regarding our operations, compliant with the rules that govern us and committed to our students. We are thoroughly familiar with Vanta Education policies relating to our individual areas of responsibility.

Only specifically authorized personnel may act as spokespersons for Vanta Education. This practice is designed to protect our employees and to ensure that our communications with our stakeholders and the public are accurate and diplomatic. Individuals who receive a request for information from outside the organization, should forward the request to the Vanta Education Legal and Compliance Department.

Individuals who participate in social networking activities are expected to demonstrate our ethical values and follow all relevant Vanta Education policies and procedures.

## USE OF VANTA EDUCATION RESOURCES

Vanta Education community members and stakeholders are expected to safeguard and use Vanta Education's resources wisely. We use good judgment and discretion when using Vanta Education resources including Vanta systems, computers, telephones, internet access, email, voice mail, copiers, fax machines, vehicles or other funds or property. We empower excellence in operations by conserving company resources and looking for appropriate savings opportunities; this includes the use of resources when travelling on behalf of the company.

Minor, incidental and infrequent personal use of Vanta Education’s resources is sometimes inevitable and allowed if the cost to Vanta Education is insignificant and the use does not deplete the value of our assets, interfere with productivity or create risk or liability to the organization.

## GIFTS AND ENTERTAINMENT

Employees who give or receive business gifts or favors, or provide or accept entertainment, should do so only when these activities accord with the Gifts and Entertainment Policy, are approved and appropriate and do not create an expectation or inference of an obligation. We must not offer, provide, solicit or accept any gifts, favors or entertainment that may be intended, considered or construed as a bribe. Any gifts that are inconsistent with these principles or our Gifts and Entertainment policy should be returned, reported or transferred in the manner described in that policy. Individuals who have any questions regarding gifts and entertainment should contact their local compliance officer or the Vanta Education Legal and Compliance Department.

Employees may not use Vanta Education’s funds or assets to give gifts, favors, entertainment or services to our suppliers, customers, vendors or government officials or government employees nor may gifts be offered or accepted from potential or active students without the advance approval of from their local compliance officer or the Vanta Education Legal and Compliance Department, as applicable.

The following principles apply to the appropriate giving and receiving of gifts, gratuities, services or favors by employees, their spouses or domestic partners or their immediate family members in connection with Vanta Education and our business:

- The giving or receiving is consistent with customary business practices.
- The giving or receiving cannot be construed as a bribe or payoff, the gift is legal in the country where the transaction takes place and the gift is in compliance with the laws that apply to us.
- The giving or receiving does not imply that additional business opportunities are contingent upon the gift/gratuity.
- The gift, gratuity, service or favor is unsolicited, infrequent and insignificant, is intended for legitimate business purposes, does not include cash and is nominal in value.
- The gift, gratuity, service or favor fully complies with Vanta Education’s Gifts and Entertainment policy.

*Please refer to the “Anti-Corruption, Anti-Bribery” section of this Code for additional guidance related to gifts and entertainment.*

## **Section 4: Honesty**

### FAIR COMPETITION

Vanta Education complies with all antitrust and competition laws that apply to us, as well as with similar laws that are intended to prevent unfair business practices or restrict competition. We compete in a global marketplace and gather information about our competitors and competing products and services only by legal and ethical means. We do not steal, misrepresent or improperly use trade secret information.

To promote fair competition and ensure compliance with these laws, we do not engage in the following activities:

- Discuss or agree to fix prices with our competitors.
- Divide up or allocate territories, markets, contracts or customers.
- Set unfair prices or attempt to monopolize or discriminate in our sales to certain customers.
- Share confidential information with our competitors about pricing, costs, profits, customers or other sensitive information that relates to our competitive practices and our organization.
- Condition the sale of products or services on the purchase of other products or services from our organization.
- Attempt to monopolize a market.

When we have formal or informal discussions with competitors and suppliers in settings such as conferences and meetings, we do so in an informed manner and after appropriate coordination with Vanta Education’s Legal and Compliance Department.

*The requirements of antitrust and fair competition laws of the countries where we do business are complicated; thus, interpreting these laws should not be attempted informally. Employees must seek assistance from the Vanta Education’s Legal and Compliance Department or their local compliance officer.*

## FAIR DEALING

We are fair and honest in all of our business dealings and do not misrepresent to anyone who we are, what we do, or what services we provide. We empower excellence by providing unparalleled support and quality service. We honor our promises and ensure that we fulfill our obligations to others. We act with accountability in everything we do.

We do not insult or disparage others, including our competitors and colleagues. To meet these standards, we take a comprehensive approach to compliance and have put processes in place to prevent, detect and respond to any action or activity that is fraudulent, illegal or unethical.

We do not engage in any of the following behaviors and will not tolerate them when used against us:

- Dishonest acts.
- Deceptive acts.
- Embezzlement.
- Forgery or alterations of negotiable instruments or other documents.
- Unauthorized handling or reporting of company transactions.
- Falsification of company records, student records or financial statements.
- Misrepresentation through false, erroneous or misleading statements or omissions of important facts in advertisements, promotions, marketing of courses or programs of instruction, public disclosures, regulatory or legal filings and reports or other communications and documents.
- Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair practice.

## DISCLOSURES BY THE COMPANY

Only authorized employees can make disclosures to the public or speak on behalf of Vanta Education. Employees who have a question about whether they are an authorized employee or whether information may require disclosure should contact the Vanta Education Legal and Compliance Department in a timeframe sufficient to address the issue.

## Section 5: Corporate Citizenship

### CHARITABLE CONTRIBUTIONS

Vanta Education believes in giving back to the communities where we live, work and serve. Employees may choose to contribute and participate in Vanta Education-sponsored charitable or volunteer work, or may participate via private giving choices. However, Vanta Education's resources and assets may only be committed to charitable works that are approved by Vanta Education's management.

### SUSTAINABILITY

With both physical facilities and online classrooms, we strive to conduct our operations and deliver education in an environmentally responsible manner. We have a continuing commitment to comply with all applicable environmental laws and regulations, and to achieve environmental excellence. Our goals are to prevent pollution, minimize waste, lower our carbon footprint, reduce greenhouse gas emissions and conserve energy and natural resources. To implement these goals, we seek to engage in sustainable business practices, including, where feasible and possible, the following:

- Purchase of environmentally preferable supplies and services from environmentally responsible suppliers and contractors.
- Energy efficiency.
- Water conservation.
- Recycling, reuse, use of recycled materials and use of materials from sustainable sources.
- Carpooling and telecommuting.
- Environmentally related employee education and involvement.

### LOBBYING AND POLITICAL CONTRIBUTIONS

Vanta Education encourages employees to vote and to participate personally in political functions and activities of their choice.

If employees choose to participate in political activities, they must make clear that their opinions and positions are their own and not those of Vanta Education. Additionally, Vanta Education's resources and assets may not be used to support personal political activities.

Vanta Education funds, property or services may not be contributed to any political party, committee or candidate for any governmental office without prior approval.

The company will never require employees to contribute to a lobbying or political activity or candidate. When lobbying, Vanta Education complies with all laws and regulations that relate to these activities. When dealing with the U.S. federal, state or foreign governments, Vanta Education complies with and reports under applicable lobbying disclosure acts.

*Before engaging in any contact with government officials or in any lobbying activities, including engagement of third-party consultants or lobbyists, employees must contact the Vanta Education Legal and Compliance Department or their local compliance officer.*

## Section 6: Integrity

### ANTI-CORRUPTION AND ANTI-BRIBERY

Vanta Education believes in doing business legally and ethically. Employees will not offer, give or receive bribes, kickbacks or other illegal payments in any form and under any circumstance.

The precise definition of what constitutes a “bribe” varies. However, a bribe is broadly defined as offering, promising, or making a payment of anything of value intending improperly to cause or influence the decisions of an individual, a company or a governmental official to act in a specific way or that creates an improper advantage. Bribes are intended to influence a person’s decision; this may mean to cause a person to act, or in some cases, to fail to act.

Examples of a bribe may include:

- Contributions to charity at the direction of a person being bribed.
- Corrupt payments that are disguised as legitimate expenses.
- Provision of gifts including company promotional items.
- Giving a job to a family member.
- Granting a scholarship to a family member of the person being bribed.
- Inappropriate rebates or discounts.
- Kickback (defined as a seller’s return of part of the purchase price of an item to a buyer or buyer’s representative for the purpose of inducing a purchase or improperly influencing future purchases).
- Meals, travel arrangements or other forms of entertainment.
- Quid pro quo arrangements.
- Personal services.

Many countries in which Vanta Education operates have anti-bribery and anti-corruption laws. We comply with all such laws and related rules and restrictions.

The U.S. Foreign Corrupt Practices Act (FCPA) prohibits the offer, payment, promise to pay or authorization of any payment or anything of value to a foreign government, political party, political candidate or employee of an international organization, or non-U.S. government organization for the purpose of obtaining or retaining business. Government officials include employees of state-owned commercial businesses. Employees are also prohibited from making “facilitation payments” as described in the FCPA.

The FCPA applies to all employees of Vanta Education as well as our officers, Board of Directors, joint venture partners, intermediaries, agents and contractors. Vanta Education abides by the FCPA everywhere in the world Vanta Education does business, even if payments or gifts are not prohibited by local law.

If any payment, entertainment expense or gift is made using company funds, including payments made to a party covered by the FCPA, the expenditure must be properly and accurately recorded in Vanta Education’s accounting systems and related records.

In addition to the FCPA, there are United Kingdom (UK) laws and regulations relating to bribery and corruption. Unlike the FCPA which relates to the bribery of foreign officials, the UK’s bribery laws prohibit bribes to government officials and employees of private businesses. Vanta Education employees are expected to comply with the strictest law or regulation that applies to the company and its operations. Violation of the FCPA or other applicable laws (such as the UK anti-bribery laws) can lead to significant civil and criminal penalties, for the company or individuals involved.

## INTEGRITY OF COMMERCIAL TRANSACTIONS

Vanta Education has in place internal controls and monitoring structures to prevent and monitor questionable transactions that may be indicators of inappropriate or illegal payments. Vanta Education and its employees must never engage in financial activities that relate to money laundering, funding terrorist activities or other illegal acts. Additionally, Vanta Education will only do business with others who respect and abide by all of the laws that govern them.

## INTERNATIONAL TRADE LAWS

Vanta Education complies with all laws and rules relating to providing goods and services internationally. Vanta Education products or services may be subject to rules of countries where products or services are marketed, sold or provided. In cases where laws may create conflicting legal obligations, individuals should contact the Vanta Education Legal and Compliance Department for assistance.

Certain services and products that move across borders, including electronic data and information, may be subject to import, export, customs or other requirements and we must adhere to these rules and obligations.

Certain individuals and countries may be subject to restrictions that preclude Vanta Education from providing services or goods to them. These restrictions might include individuals or countries that engage in terrorist acts.

Vanta Education complies with “anti-boycott” laws. This requires Vanta Education to avoid participating in boycotts or restrictive trade practices. Some restrictive trade protection activities may be allowed if they are approved by the strictest law that governs. In cases where laws may create conflicting legal obligations, individuals should contact the Vanta Education Legal and Compliance Department for assistance.

## Section 7: Business Excellence

### RECORDS MANAGEMENT

Vanta Education’s information and records are valuable corporate assets and must be managed with due care. Vanta Education must comply with legal and regulatory requirements that relate to document and record retention and disposition. Employees, outside consultants, contractors, vendors and agents that do business on behalf of Vanta Education should manage Vanta Education records consistent with these requirements and any other Vanta Education directives.

In the event that Vanta Education becomes aware of, or reasonably anticipates, litigation or a government investigation, actions must be taken to preserve all relevant documents and information and suspend any related destruction processes.

### ACCOUNTING PRACTICES

Vanta Education maintains appropriate internal controls in order to ensure that Vanta Education financial reports, records and disclosures are complete, accurate, and timely, and fairly reflect the transactions and activities. Vanta Education maintains books and records in reasonable detail and in accordance with appropriate accounting policies, procedures, standards and regulations.

In connection with Vanta Education accounting policies and procedures, the following apply:

- Invoices rendered by Vanta Education accurately reflect the price and terms for products and services.
- Vanta Education retains complete and accurate accounting records, including records relating to political contributions and payments made to government officials.
- Vanta Education does not make false or misleading entries in our financial books and records.
- Vanta Education does not establish undisclosed or unrecorded bank accounts or assets.
- Payments are only made for the purpose that is described in the related supporting documents.
- Payments and reimbursements are made only for legitimate business expenses that were incurred and properly documented in accordance with Vanta Education policies.
- Any promotional activities involving government officials must be approved in advance by the Vanta Education Legal and Compliance Department.

Vanta Education will never issue, offer, authorize, receive or pay a bribe. Individuals who are responsible for making or reviewing payments must ensure that they are familiar and fully compliant with our related anti-bribery and accounting policies. This includes not making payments where a red flag is present or where there are concerns regarding the legitimacy and appropriateness of the payment. Examples of common red flags can be found in Vanta Education's Anti-Bribery policies.

#### SOURCING INTEGRITY, FALSE CLAIMS AND GOVERNMENT CONTRACTS

Vanta Education places great emphasis on conducting strategic sourcing practices in a fair, ethical, and transparent manner. Vanta Education engages contractual partners (consultants, contractors, vendors and third parties) who share our values and our principles of ethical behavior.

Vanta Education expects employees who are involved in contractor selection, purchasing, or related approval processes will act with objectivity, integrity and care consistent with our procurement policies, procedures, and the relevant regulations relating to government contracts.

Vanta Education is always truthful and avoid false claims or statements to our customers, business partners, subcontractors, or vendors. Vanta Education does not submit false claims to any party, including the government, for payment or approval, make or deliver a false receipt for government property, or knowingly buy property from a person who is not authorized to sell such property.

#### EDUCATION REGULATIONS

Vanta Education is committed to maintaining compliance with the education regulations and other applicable laws and regulations. Vanta Education employs legal experts and professionals with expertise concerning these laws and regulations. Employees should not attempt to interpret Vanta Education's responsibilities related to these obligations without consulting our experts in this area. Depending on the nature of their positions, employees will be informed of actions that may need to be taken and processes that apply to them in order to ensure our compliance.

#### PRIVACY

Vanta Education is entrusted with confidential information, including personal information, from our employees, students, faculty, vendors and others, and recognize our responsibility to protect and use this information with respect and care. Vanta Education protects confidential information by designating individuals within the organization to be responsible for our Privacy and Information Security programs as

well as by implementing appropriate safeguards to protect confidential information from misuse, compromise, or loss.

These are our core privacy principles:

- Vanta Education employs appropriate levels of protection necessary for the security and quality of confidential information.
- Confidential information is only transferred consistent with Vanta Education privacy policies.
- Confidential information that Vanta Education collects is retained no longer than the minimum time necessary to fulfill legitimate business purposes or comply with statutory, regulatory, or other legal requirements.
- Confidential information is only used for legitimate business purposes and as permitted and required by Vanta Education agreements, statutes or regulations.
- Vanta Education privacy policies are disclosed as required by law or regulation.

## **Section 8: Respect**

### **CONFIDENTIALITY AND INTELLECTUAL PROPERTY**

As described in the Privacy section of the Code, Vanta Education is expected to preserve and protect confidential information. Vanta Education takes effective measures to secure and store data to protect against the loss, misuse and alteration of the information under our control.

Confidential information includes information relating to employees, students and faculty, or company proprietary information. Examples of such confidential information may include:

- Personal information.
- Financial information.
- Business and marketing plans.
- Academic strategy and agreements.
- Proprietary technical information and other similar information.

In addition to being confidential information, this information is the property of Vanta Education and its various stakeholders and may be protected by patent, trademark, copyright, privacy and trade secret laws. Additionally, Vanta Education respects the patents, trademarks, copyrights and confidential information of other companies.

Company confidential information must be used for legitimate business purposes only and consistent with Vanta Education policies and applicable law. Employees are expected to maintain the confidentiality of information entrusted to them by Vanta Education, our students, vendors and competitors, and to prevent disclosure of this information unless the disclosure is appropriately authorized by Vanta Education policies or as otherwise legally required.

An employee's obligation to preserve and protect confidential information continues even after employment with Vanta Education ends.

## OUR LABOR PRACTICES

Vanta Education believes in treating each other fairly and with respect, and Vanta Education protects and supports human rights in all communities in which we operate. Vanta Education expect all of our business partners and vendors to adhere to these same standards. Vanta Education will never use child labor or forced labor, and Vanta Education respects and complies with all relevant labor laws. Each of Vanta Education community members is responsible for creating a workplace that is safe, supportive of one another and our ethical culture, and free from abuse of any kind. Vanta Education is an equal opportunity employer and complies with all applicable laws in jurisdictions where we operate.

## DIVERSITY

Vanta Education works in a diverse, global and ever-changing workplace and industry. Vanta Education embraces this aspect of who we are and value our differences as a source of innovation and competitiveness. Vanta Education encourage our teams to understand the dynamics of their students, customers and industry. To demonstrate the Vanta Education commitment to each other and our values, we expect our employees will treat everyone they encounter in the course of their work with dignity and respect.

## WORKPLACE SAFETY

Vanta Education is committed to providing a safe and healthy workplace and make every effort to comply with all applicable compliance requirements related to occupational health and safety. Each of the Vanta Education community members share the responsibility for ensuring workplace safety by taking reasonable precautions to prevent accidents and report unsafe conditions.

Employees should use common sense and sound judgment related to actions in the workplace and when conducting business on our behalf. Vanta Education expects that employees will not engage in risky activities that may endanger themselves or others.

## WORKPLACE VIOLENCE

We do not tolerate workplace violence. Any violent acts or threats including, but not limited to the following, will not be tolerated in any form.

- Intimidation
- Bullying
- Stalking
- Verbal or physical aggression
- Threats
- Harassment
- Retaliation
- Coercion

## EQUAL OPPORTUNITY, DISCRIMINATION AND HARASSMENT

Vanta Education makes employment decisions on the basis of merit and business needs, are an equal opportunity employer and comply with all applicable employment and labor laws and regulations.

Vanta Education is committed to a work environment that fosters trust, creativity and excellence. In furtherance of this goal, Vanta Education promises and expects all of the Vanta Education community members will treat each other, our colleagues and our students with respect and dignity and encourage others to act similarly.

Vanta Education does not tolerate discrimination or harassment of any kind.

## NON-RETALIATION

Retaliation against employees who raise good faith concerns about harassment, discrimination or other inappropriate behavior is prohibited. This also applies to employees who have provided information during an investigation, inquiry or audit. Retaliation can include, but is not limited to:

- Dismissal from employment;
- Demotion;
- Loss of salary or benefits;
- Transfer or reassignment;
- Denial of a promotion;
- Spreading malicious rumors concerning another individual;
- Committing acts of discrimination or harassment;
- Disparaging the work or character of an individual; or
- Bullying or intimidating an individual.

Vanta Education is committed to protecting employees from retaliation and will ensure that reports of retaliation are thoroughly and promptly reviewed and that appropriate corrective action is taken. If an employee feels that he or she has been the subject of retaliation, the employee is encouraged to immediately report his or her concerns to:

- Any member of management;
- Vanta Education Human Resources;
- The Vanta Education Legal and Compliance Department; or
- The Vanta Education Ethics Helpline.

The expectation is that individuals who report concerns do so in good faith. Making a report in good faith means that the information that is being reported is true to the best of the individual's knowledge and includes information that the person reporting considers relevant.

## **Section 9: Assistance and Reporting Concerns; Investigations**

### ASKING QUESTIONS OR REPORTING CONCERNS

Vanta Education is committed to providing resources that assist employees in understanding their compliance obligations and to providing coaching and guidance on ethical issues that may arise. Vanta Education provides training regarding ethics and compliance matters for management and employees.

Oftentimes, your manager or supervisor is the best person to contact regarding your questions. Additionally, the Vanta Education Legal and Compliance Department works with employees, managers and others to answer any questions related to this Code or other company policies.

If there is any reason to believe that there has been a violation of our Code, Vanta Education's policies or a law or regulation, or if an individual has witnessed what is believed to be illegal or unethical behavior in our workplace, employees have a responsibility to report this promptly.

Failure to report a violation is itself a violation of this Code. Nothing in this Code is intended to discourage reporting any illegal activity, including a violation of any securities law, or antitrust law, or any other federal, state or foreign law, rule or regulation to the appropriate regulatory or legal authority.

Issues may be reported via the following processes:

- Contact Vanta Education Human Resources.
- Contact the Vanta Education Legal and Compliance Department.
- Contact the Vanta Education Ethics Helpline. The Helpline is available 24 hours a day and seven days a week at 1-866-921-6714. The Helpline calls are answered by professionals who are able to take reports in over 150 different languages. You may also file a report online at [www.integritycounts.ca/org/VantaEducation](http://www.integritycounts.ca/org/VantaEducation). You may choose to make your report anonymously.

*What Happens When I Call or Submit a Report to the Helpline?*

*Your report will be appropriately reviewed by the Vanta Education Legal and Compliance Department or their delegate. You may call back or check online at any time to add additional information to your report, to check for any questions posted by Vanta Education Ethics and Compliance Department, or to obtain the status of your report.*

## ENFORCEMENT

If Vanta Education receives information regarding an alleged violation of this Code, it will take prompt action to evaluate the information and determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate an inquiry or investigation. Violations of this Code may result in disciplinary action up to and including termination as well as referral to law enforcement as appropriate.

It is Vanta Education's expectation that individuals who report concerns do so in good faith. Making a report in good faith means the information that is being reported is true to the best of the individual's knowledge and includes information that the person reporting considers relevant.

Vanta Education will maintain the confidentiality and protect the identity of any complainant to the maximum extent possible. Confidentiality means that Vanta Education will not disclose the identity of the individual reporting the concern or allegation unless it is determined during the course of the investigation that it is unavoidable or that Vanta Education is required by law to disclose the information.

Employees cannot be discharged, demoted, suspended, threatened, harassed or in any other manner discriminated or retaliated against for reporting a violation. Likewise, employees cannot discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against those who report a violation.

## INVESTIGATIONS AND AUDITS

Employees are expected to cooperate fully and to provide accurate, timely and complete information when involved in a discussion, audit or a reporting or disclosure process with an internal or external auditor or

investigator, law enforcement personnel or regulator. Failure to cooperate in an audit or investigation may lead to disciplinary action, up to and including termination.

In the event of a government investigation or audit, employees should contact the Vanta Education Legal and Compliance Department or their local compliance officer regarding any additional procedures that may apply, including record preservation holds and similar protocols.

#### THANK YOU FOR READING OUR CODE OF BUSINESS ETHICS

We hope that the Code has provided you with clarity regarding our ethical principles and approach to conducting business. Please refer to the Code as you go about your daily work to help you do the right thing and make ethical decisions. Thank you for your ongoing dedication to the Code and its principles.