



Supplier Code of Conduct

INTRODUCTION

Vanta Education is committed to acting honestly and the highest level of ethics and integrity.

Our Code of Business Ethics establishes the principles related to ethical behavior and the appropriate behavior that all employees of Vanta Education must follow. In this Supplier Code of Conduct, similar standards are specified for our suppliers, collaborators and business partners (collectively “suppliers”). We expect our suppliers to comply with these standards, and require our employees who contract and interact with our suppliers to ensure compliance.

To comply with our Supplier Code of Conduct, Vanta Education expects its suppliers to conduct their businesses in an ethical manner and act with integrity. The ethical requirements include the following aspects:

I. RECORDS AND REPORTS

Vanta Education expects all of our suppliers to keep accurate records of all matters related to their business with Vanta Education, including financial records properly recording all expenses incurred and payments made to others, including in particular any gifts, meals, travel and entertainment. We also expect all of our suppliers to keep accurate, complete and appropriate financial records in support of all payments made for services rendered to Vanta Education.

The above may also include time records of hours worked by the employees of the supplier assigned to Vanta Education. It is expected that all supplier invoices are accurate, timely and complete.

Suppliers must allow Vanta Education, upon request, access to all records related to commercial matters related to Vanta Education, under the terms and conditions stipulated in the supplier's contract.

II. PROPERTY AND INFORMATION

Suppliers must protect the assets and information of Vanta Education. Suppliers that have been granted access to Vanta Education property or intellectual property must use them only within the scope of the authorization granted by it in the supplier’s contract and exclusively for that purpose.

Suppliers who have been granted access to confidential information may not share such information with anyone, unless expressly permitted under the terms of the supplier’s agreement with Vanta Education or authorized by Vanta Education in advance and in writing to do so. Suppliers must properly protect all confidential information and personal data, in accordance with its own best practices and in accordance with the supplier’s contract with Vanta Education and all laws, rules, regulations and current guidelines on privacy and data security.

If a supplier considers that it has been granted access to confidential information by mistake, it should immediately notify his contact at Vanta Education.

III. BRIBERY AND CORRUPTION

Vanta Education has a policy of zero tolerance with regard to the offering, making, soliciting or acceptance of any bribes or kickbacks in connection with any transactions that in any way may involve Vanta Education.

Suppliers may not assign anything of value, directly or indirectly, to anyone, including among others, government officials, employees of government controlled entities, or employees of Vanta Education or any other organization, in order to obtain an improper advantage or benefit.

Suppliers acting on behalf of Vanta Education must comply with all applicable laws regarding bribery and corruption.

IV. GIFTS, MEALS, TICKETS AND OTHER PROFESSIONAL ATTENTION

Vanta Education employees may exchange gifts, meals, entertainment and other professional courtesies with suppliers only if they are reasonable, infrequent and modest in amount, and comply with local laws, customs and practices in addition to the Gift and Entertainment policy of Vanta Education.

Vanta Education employees are subject to limitations on the value of the professional courtesies they may offer or receive. In all cases, Vanta Education employees may never offer or accept such courtesies if they could affect, or give the idea that they may affect, a decision, and under no circumstances is a gift or receipt of cash acceptable.

V. CONFLICTS OF INTEREST

Suppliers may not keep any kind of financial relationship with any Vanta Education employee with whom the supplier interacts as part of their work. In addition, suppliers must use caution to ensure that any type of personal relationship with employees of Vanta Education is not used to influence the judgment of Vanta Education employees in matters related to the commercial relationship between the supplier and Vanta Education.

If the supplier has a relative at Vanta Education or any other type of relationship with an employee of Vanta Education that could represent a conflict of interest, the supplier must inform Vanta Education of this. Note that every employee of Vanta Education who knows of a conflict of this type has the obligation to report it in accordance with the provisions of the Vanta Education policy on Conflicts of Interest.

VI. REPORTING CONCERNS (WITHOUT RETALIATION)

Suppliers who believe that an employee of Vanta Education or anyone acting on behalf of Vanta Education is involved in any type of illegal or inappropriate conduct should report the matter to Vanta Education immediately.

Suppliers should raise the concern by reporting the concern via the ethics helpline 1-866-921-6714, or by visiting www.integritycounts.ca/org/VantaEducation. A supplier's relationship with Vanta Education will not be adversely affected if potential misconduct is reported honestly; Vanta Education's policy strictly prohibits any type of retaliation against persons who report in good faith potential infractions to compliance violations.