

Supplier Code of Conduct

Introduction

For over 50 years, KinderCare has supported families with high-quality early childhood education programs across the country. Our families, clients, and communities trust us to care for and educate their children because they know we are committed to high standards. Our core values—integrity, honesty, trust, respect, and teamwork—define both our operating principles and how we interact with the world.

As we continue to operate and grow our business, all of us at KinderCare are committed to business integrity, responsible product sourcing, the health and safety of our employees and the families we serve, respecting human rights, protecting the planet for future generations. These principles apply to all aspects of our business and encompass all manufacturers, distributors, vendors, and other Suppliers (each a “Supplier” and collectively “Suppliers”) that supply products, services and technology to KinderCare and our brands.

Applicability

Compliance with this Code of Conduct (“Code”) establishes the minimum standards for any Supplier that sells goods or provides services to KinderCare or its affiliates or subsidiaries. This code aligns with leading international frameworks and regulations, including the United Nations Guiding Principles on Business and Human Rights, ILO Core Conventions, the OECD Guidelines for Multinational Enterprises, and sustainability standards such as GRI and ISO 14001.

This Code applies to all Suppliers to KinderCare. Suppliers are responsible for ensuring compliance with these standards throughout their operations and supply chains. For products, this means the end-to-end process, from design and sourcing to manufacturing, packaging, warehousing, distribution, logistics. For all products, services and technology, this includes sales, marketing, worker safety, product safety, intellectual property, labor, immigration, health, and environmental practices.

Many of our Suppliers purchase products from manufacturers and sell to us. Almost all provide products, services or technology through partners, subcontractors and/or their own Suppliers. Suppliers are also responsible for ensuring their Suppliers, agents, subcontractors, and partners comply with this Code.

Audit

KinderCare reserves the right to audit Suppliers, to assess compliance with this code. Suppliers shall cooperate fully by providing access to relevant facilities, records, and personnel.

Labor and Human Rights

KinderCare expects that all people are treated fairly and that their rights are protected. Suppliers should be familiar with the United Nations' Guiding Principles on Business and Human Rights, and should exercise due diligence to identify, prevent, mitigate, and address actual or potential adverse human rights issues associated with their own operations or their Supplier's operations.

Employing child labor, which includes anyone under 15 years old, the local legal minimum age for employment, or the age required to complete compulsory education—whichever is higher is prohibited.

KinderCare does not allow forced or incarcerated labor and human trafficking and will not knowingly work with Suppliers who engage in these practices. Suppliers must allow all workers to have the right to engage in work willingly with the right to terminate their employment without penalty upon providing reasonable notice and without being asked to surrender identification or documents and without the payment of fees.

► **Non-Discrimination and Harassment**

We expect our Suppliers to engage in fair hiring and labor practices. Suppliers must not discriminate in hiring and employment practices, including with respect to salary, benefits, training and advancement, discipline, termination, or retirement, nor on the basis of race, religion, color, sex, sexual orientation, gender identification, national, social or ethnic origin, age, marital status, military or veteran status, disability, pregnancy, union membership, political affiliation, or any other basis prohibited by applicable law.

Everyone deserves to be treated with dignity and respect, and we expect the same from our Suppliers with how they treat their employees, Suppliers and customers. This includes proactively ensuring no corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Suppliers must not tolerate and must address any such discriminatory or harassing behavior by its partners not only if it's done by its own employees but also by its Suppliers, partners or subcontractors.

► **Fair Wages & Benefits**

We expect our Suppliers to compensate their employees appropriately, in compliance with all laws and regulations including those related to minimum wages, overtime, piece rates, and other elements of compensation. Supplier's obligation to compensate and provide benefits always applies to all workers during periods of training, apprenticeship, and probation.

Withholdings or deductions from pay must be lawful, clearly communicated to workers, and must not be used as a form of punishment or to otherwise impede workers' rights.

Suppliers must ensure workers are provided all legally required benefits including, but not limited to, family leave, illness, healthcare, vacation, and unemployment. Suppliers must ensure that employer contributions are paid in an accurate, timely, and clearly communicated manner.

Supplier shall provide (i) proof of payment to workers showing hours worked, wage amounts and rates (regular, overtime, and bonus), and deductions; (ii) ensure that proof of payment is accurate, is clearly calculated, and enables workers to quickly verify the amount of payment and method of calculation; and (iii) maintain proper documentation of wage payments for their internal records.

► **Freedom of Association**

Suppliers must respect workers' rights to join, associate, organize, or participate in lawful collective bargaining in a peaceful manner without penalty, interference, harassment, or discrimination.

Worker Health, Safety and Facilities Standards

Safety and health are of utmost importance in KinderCare's operations, and we expect our Suppliers to prioritize it equally by ensuring a safe and healthy workplace, taking all necessary steps required to ensure prevention or mitigation of injury or accidents that may arise from the course of their work, as well as provide guidance and training especially on proper chemical management and disposal.

While some of these requirements may not pertain to your own operations, you may work with Suppliers in regions where workplace standards differ. Regardless of location, KinderCare expects our Suppliers to ensure all Suppliers in their value chain meet these requirements, even in areas where local regulations may be less stringent. Examples of standards include providing workers with adequate and accessible restrooms, potable water, sanitary food preparation, storage and eating facilities, personal protective equipment, safe machinery and tools, training to prevent and mitigate accidents, adequate temperature control and ventilation, and sufficient lighting.

► **Facilities and Emergency Preparedness**

Suppliers must ensure that all facilities provide a safe environment for employees and that they meet applicable building codes, zoning, and use permits. Safety measures required include adequate, (i) evacuation plans; (ii) exit lighting with unobstructed emergency exits; (iv) fire safety prevention; and (v) first aid kits.

Product Quality and Safety Standards

Suppliers must ensure all products are safe and will hold up in a heavy traffic, high use environment like in our centers and sites. It's particularly important for products for our centers and Sites that products are made of non-toxic, child-safe materials and are designed to ensure safety such as ensuring no choking potential.

Supply Chain Governance and Security

► Supply Chain Oversight

KinderCare views subcontractors and your Suppliers to be an extension of your company. KinderCare must approve the use of subcontractors. Suppliers must perform proper diligence when selecting these resources and maintain oversight to ensure compliance with this code of conduct.

KinderCare expects Suppliers to develop visibility into their supply chains and take reasonable steps to ensure raw materials and components are responsibly sourced. As industry standards and regulatory requirements evolve, we anticipate strengthening our approach to supply chain traceability and transparency. Suppliers are expected to prepare by improving data tracking and documentation related to their sourcing practices.

► Responsible Sourcing

We expect our Suppliers to take steps to minimize environmental and social risks in their supply chains. Suppliers are encouraged to adopt environmentally responsible sourcing practices such as protecting water sources and to prevent deforestation and forest degradation.

Suppliers must ensure that materials are not sourced from embargoed or sanctioned countries as defined by U.S. or relevant international law.

Environmental Responsibility

In line with KinderCare's commitment to sustainability, we encourage Suppliers to minimize their environmental footprint and adopt practices that conserve natural resources and reduce emissions. Suppliers must operate and comply with relevant environmental regulations, including proper handling and disposal of hazardous materials, adherence to local air and water quality standards, and implementation of sustainable waste management practices.

While current regulatory requirements continue to evolve, we anticipate future obligations related to the disclosure of Suppliers' emissions and climate risk, and as such, we expect Suppliers to begin preparing to meet these expectations by enhancing their environmental data tracking and disclosure practices. This includes tracking key metrics such as greenhouse gas emissions, energy use, and waste generation, in alignment with standards required by federal and state regulations, including California's Climate Accountability Package (SB 253 and SB 261).

Data Protection And Privacy

We expect our Suppliers to protect our data as if it were your own personal data and ensure it is housed in a safe and secure location, and that access is controlled and protected. Our Master Terms outline compliance requirements.

► Intellectual Property

KinderCare takes pride in its brand and therefore wants to ensure it is only be used in a light and forum that represents who we are, so Suppliers must get written consent to use KinderCare's intellectual property, including trademarks and copyrights.

Ethical Business Practices

Suppliers must uphold the highest ethical standards and are expected to conduct business with integrity, transparency, and honesty. Any exchange of favors, money, gifts, travel, or entertainment intended to influence business decisions is strictly prohibited. KinderCare employees, members, and agents are held to the same standards.

► Anti-Corruption and Bribery

Suppliers must comply with all applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and similar global regulations. Suppliers may not offer, give, or accept bribes, kickbacks, or other improper payments, whether directly or through third parties, in any business dealings related to KinderCare.

► Grievance Mechanisms

Suppliers must implement effective grievance mechanisms to systematically receive, investigate and respond to issues raised and implement remedies to resolve them. The United Nations Guiding Principles on Business and Human Rights defines an effective grievance mechanism as legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on engagement and dialogue, and used as a source of continuous learning.

► Reporting Misconduct

Suppliers shall self-report any violations of the Code. Supplier can also submit questions and comments regarding the Code to KinderCare's liaison.

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 Code.

Reports may also be submitted anonymously through KinderCare's Ethics Hotline at [KinderCare EthicsPoint.com](https://www.kindercareschools.com/ethicspoint)

► Termination of Relationship

KinderCare may immediately terminate its business relationship (including any purchase order(s) and purchase contracts) with Supplier if Supplier, its partners, or subcontractors fail to comply with this Code.

Closing Statement

At KinderCare Learning Companies, acting responsibly is at the heart of how we do business. Integrity, transparency, and accountability guide how we build trust with the families, educators, and communities we serve. This Supplier Code of Conduct reflects that commitment and underscores our shared responsibility to ethical decision making and responsible business practices. By upholding these standards, we help protect the people and planet we all depend on, strengthening the confidence we build for kids, families, and the future we share.