



## SUPPLIER CODE OF CONDUCT

Effective Date: March 31, 2026

### (Suppliers Providing Goods and Services in the U.S.)

Bright Horizons is committed to providing the highest quality early education and childcare, work life solutions, and workforce education services that are designed to help working families and client employees thrive personally and professionally. Bright Horizons' HEART Principles – Honesty, Excellence, Accountability, Respect, Teamwork – guide us in the work we do each day, and we expect our trusted vendors and suppliers (collectively, “**Suppliers**”) to meet similar, high ethical and legal standards in providing Bright Horizons with goods and services. This Supplier Code of Conduct (“**Supplier Code**”) sets out our expectations for all Bright Horizons' Suppliers with respect to legal and regulatory compliance and ethical business practices.

#### 1) About this Supplier Code of Conduct

It is the responsibility of each Supplier to: (a) be familiar with all provisions and requirements of this Supplier Code; (b) establish appropriate controls and processes to ensure that its requirements are met; (c) operate in accordance with its principles; and (d) report any non-compliance to Bright Horizons and take all necessary actions to remediate the non-compliance. In addition to the requirements contained in this Supplier Code, each Supplier is expected to meet all legal and regulatory requirements applicable to it and its business in the geographic areas where it operates or where goods and services are provided to Bright Horizons. The requirements of this Code must be met even if they are stricter than applicable laws and regulations.

This Supplier Code may be amended from time to time; the most current version is available online and effective when published. With prior notice and at our expense, Bright Horizons may conduct reasonable audits to verify a Supplier's compliance with the terms of this Supplier Code. If we reasonably determine that a Supplier has violated this Supplier Code, we may take all appropriate action to remedy the violation, including termination of our relationship with Supplier.

This Supplier Code does not constitute an employment contract and nothing contained herein is intended to convey any rights, actions, or remedies to Suppliers, or to create an employment relationship between Suppliers or Suppliers' employees, their agents, and representatives and Bright Horizons.

#### 2) Bribery, Anti-Corruption & Competition

Bright Horizons prohibits corrupt payments of all kinds. Suppliers are expected to comply with the U.S. Foreign Corrupt Practices Act and all other anti-corruption and anti-money laundering laws.

Suppliers are expected to compete fairly for Bright Horizons' business, without attempting to secure an advantage through improper or illegal means, including without limitation: payments, rewards, kickbacks, or other benefits to Bright Horizons' employees, government officials, subcontractors, or other third parties. Bright Horizons' employees or agents may not be given, offered, or promised any commission, gift, gratuity, bonus, discount, other benefit, or reward for themselves, family members, or other third parties in connection with Bright Horizons' engagement of a Supplier or its business. Bright Horizons will discontinue its relationship with any Supplier if there is reason to believe that there may be intent to improperly influence decisions or impair objectivity related to its business dealings.

Suppliers must conduct their businesses in full compliance with the antitrust and fair competition laws applicable to their businesses. Suppliers must maintain accurate financial books and business records in accordance with accepted accounting practices and all applicable laws.

#### 3) Conflicts of Interest

Suppliers shall not allow bias, conflict of interest, or inappropriate influence of others to impact their businesses and/or the professional responsibilities of their personnel. Suppliers are required to disclose any known, related-party transactions or relationships or conflicts of interest between Supplier (their officers, directors, managers, and family members) and Bright Horizons.

#### 4) Safe Workplace and Working Conditions

Bright Horizons believes in a positive, safe workplace which includes a dynamic, inclusive workforce and affords equal employment opportunities to all. Suppliers must comply with all applicable employment laws and regulations and provide workplaces that are free from

discrimination, harassment, and abuse and threats of harassment and abuse. To the extent not exempt, Suppliers and their subcontractors will comply with Section 503 of the Rehabilitation Act, as amended; the Vietnam Era Veterans' Readjustment Assistance Act, as amended; and the requirements of 41 CFR §§ 60300.5(a) and 60-741.5(a). **These laws and regulations prohibit discrimination against all individuals based on their disability status and status as a protected veteran or spouse/family member of a protected veteran and require that covered prime contractors and subcontractors employ and advance in employment individuals without regard to disability status and status as a protected veteran or spouse/family member of a protected veteran.**

Suppliers must comply with all health, safety and wage/working hours regulations. Suppliers shall meet applicable standards regarding working conditions across their entire workforce, including complying with local, state and federal laws and regulations requiring the payment of a legal minimum wage as well as complying with all wage, hour and rest break laws and regulations. In addition, Suppliers are expected to provide a safe, clean and healthy work environment and take necessary precautions to prevent accidents, injury, and harmful exposures. Suppliers must operate in compliance with, or to exceed, all applicable health and safety laws, regulations, and standards

## **5) Human Rights**

Suppliers are expected to adhere to the principles set out in Bright Horizons' Human Rights Policy Statement, which follows the UN Guiding Principles on Business and Human Rights, the ILO Declaration of Fundamental Principles and Rights at Work, and other authorities. In practice, this means that Suppliers must take all actions needed to assure that they do not: (1) hire or employ anyone under the minimum legal age to work; (2) use or benefit from forced labor; (3) fail to meet local, state or federal minimum wage and working conditions laws and regulations; or (4) engage in or condone human trafficking or modern-day slavery. Bright Horizons requires that Suppliers recognize and respect their employees' rights to freely associate and engage in collective bargaining, and that Suppliers do not to discriminate or retaliate against any employee exercising their protected rights.

## **6) Sustainability**

Bright Horizons' Suppliers must meet all applicable environmental laws and regulations where they operate. We encourage Suppliers to conduct operations in a manner that protects our environment by reducing energy use, greenhouse gas emissions, and waste, and to take all reasonable measures to conserve water and other natural resources.

## **7) Confidential Information**

Bright Horizons' Confidential Information includes all non-public, business information which Suppliers may have access in the course of providing goods or services to our company. Suppliers are expected to safeguard and protect this Confidential Information and to use it only as permitted by Bright Horizons and as needed to fulfill their roles as suppliers to our company. Suppliers may not use Bright Horizons Confidential Information to buy or sell Bright Horizons or other securities or to communicate tips based on this information.

## **8) Supplier Compliance and Reporting**

Suppliers must establish and maintain management systems that secure compliance with this Code and all applicable laws and regulations, and that mitigate identified risks. Suppliers are expected to allocate appropriate resources to demonstrate their commitment to the principles outlined in this Code. Upon Bright Horizons' request, Suppliers shall provide documentation demonstrating compliance with this Code, applicable laws and regulations.

To report questionable behavior or a possible violation of this Supplier Code, Suppliers are required to immediately, but no later than 24 hours from detection, report:

(a) Any actual or suspected violation of this Supplier Code via Bright Horizons' 24/7 anonymous and confidential ethics hotline at 1.800.461.9330 or <http://www.convercent.com/report>.

(b) Any known or suspected data breach, loss, destruction, damage, alteration, or disclosure of Bright Horizons Confidential Information, including a reasonably detailed summary of its nature and impact, to [dataprivacy@brighthorizons.com](mailto:dataprivacy@brighthorizons.com).

Suppliers may also raise an ethics-related concern via Bright Horizons' 24/7 anonymous and confidential ethics hotline at 1.800.461.9330 or <http://www.convercent.com/report>.

Bright Horizons prohibits intimidation, retribution, or retaliation of any kind against those who make a good faith report or who otherwise participate in related investigations.

\*\*\*