



SUPPLIER CODE OF CONDUCT

Updated: March 2025

SUPPLIER OBLIGATIONS

All Bright Horizons suppliers and their employees, agents and subcontractors shall:

1. **Conduct business responsibly**, with integrity, honesty, and transparency.
2. **Comply with all laws and regulations** applicable to the states and countries where they operate.
3. **Compete fairly for Bright Horizons' business**, without attempting to secure an advantage through improper or illegal means, such as payments, rewards, bribes, 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, unusual discount, or other benefit or reward for themselves, family members, or others in connection with the Supplier's contract or retention.
4. **Create a safe, healthy work environment which encourages diversity and is free from discrimination, harassment, or any other abuse.** Suppliers will engage in sound, fair employment practices consistent with legal and industry standards.

Pursuant to 41 CFR 60-1.4(a), 41 CFR 60-300.5(a), and 41 CFR 60-741.5(a), Vendor and its subcontractors shall abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a), and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their race, color, religion, sex, or national origin or their protected status as veterans or persons with disabilities.

Vendor and its subcontractors are required to take affirmative action to employ and advance in employment these qualified individuals and to comport with the notice provisions of 29 CFR Part 471, Appendix A available at:

<https://www.dol.gov/olms/regs/compliance/EO13496.htm>
5. **Act in an environmentally responsible manner**, considering opportunities for conservation, recycling, and pollution control that promote cleaner air and water and reduce landfill waste.
6. **Maintain accurate financial books and business records** in accordance with all applicable legal and regulatory requirements and accepted accounting practices.
7. **Establish appropriate controls and processes to ensure that the requirements of this Code are met.** With prior notice, Bright Horizons may conduct reasonable audits to verify Supplier's compliance.
8. **Safeguard Bright Horizons' Confidential Information.** Suppliers may have access to or be entrusted with Bright Horizons' Confidential Information, which includes all non-public, business information that might be useful to competitors or harmful to Bright Horizons or its customers, if disclosed. Suppliers are expected to safeguard and protect such information and to use it only as permitted by Bright Horizons.
9. **Prohibit use of Bright Horizons Confidential Information to:**
 - **Buy or sell Bright Horizons or other securities**, while in possession of material nonpublic information; OR
 - **Communicate (or "tip") material nonpublic information to someone who either** trades in the securities based on that information or provides the information to someone else who trades.

SUPPLIER COMPLIANCE AND REPORTING

Suppliers are expected to exercise sound judgment and seek the advice of the Bright Horizons CCO when questions or concerns arise. Suppliers will immediately report:

- **Any actual or suspected breaches of this Code or any other actual or suspected impropriety, fraud, or dishonesty** to the Bright Horizons Chief Compliance Officer ("BH CCO").
- **Any known or suspected data breaches, loss, destruction, damage, alteration, or disclosure of Bright Horizons Confidential Information within 24 hours of discovery. In the event of a breach, Supplier will consult with Bright Horizons which shall have the right to participate in, control and direct any investigation, response and/or remediation.**
- **Any known related-party transactions or relationships between Suppliers** (their officers, directors, managers, and family members) **and Bright Horizons**, its affiliates, large shareholders, directors, officers, managers, and family members.

CONTACT AND REPORTS

All contact or reports to Bright Horizons shall be made to the BH CCO at 2 Wells Ave, Newton, MA 02459 or 617.673.8118. Security or other data breaches may also be reported to dataprivacy@brighthouse.com to meet the 24-Hour requirement.