

A woman with glasses and a blue sweater is sitting at a desk, looking at a laptop. Her hand is resting on her chin. The background is a blurred indoor setting with a plant and a teal mug. The image is overlaid with a semi-transparent dark blue filter and several colored squares (orange, teal, blue, grey) in the corners and along the edges.

# Supplier Code of Conduct

## Introduction

Our mission at Sterling is to provide the foundation of trust and safety our clients need to create great environments for their most essential resource: people. We believe everyone has the right to feel safe. As such, Sterling is committed to operating its business in a way that builds trust and confidence. We expect suppliers to operate within the framework of principles, guidelines, and policies aligned with our ethical, social, and environmental responsibilities described in this Supplier Code of Conduct (the “Code”). We believe that operating within these guidelines is critical for protecting, managing, and enhancing our brand and reputation. We also believe that our standards as set forth in this Code will drive long-term, sustainable growth for Sterling, our business partners, and the communities in which we operate.

We strive to conduct business with suppliers who share our commitment to operating in a responsible and ethical manner. In addition to the responsibilities outlined herein, suppliers must comply with all applicable laws, legal regulations, directives, and guidelines as well as all obligations in any contract a supplier may have with Sterling.

### 1. Ethics

Suppliers will conduct their business in an ethical manner and act with integrity. Expectations include:

- **Fair competition** –Suppliers shall conduct their business using fair business practices, consistent with fair competition, truth in marketing, anti-trust laws and in compliance with all applicable laws, rules, and regulations that prohibit restriction of competition.
- **Reporting unethical behavior** – Suppliers shall have a means for employees to report grievances anonymously and shall encourage their workers to report concerns or illegal activities within their workplace without threat of retaliation, intimidation, or harassment. Suppliers shall monitor, investigate, and take corrective action

where needed. Suppliers will document and maintain records of reported cases.

- **Privacy** – Suppliers will protect the personal information of everyone they do business with, including customers, suppliers, consumers, and employees.
- **Preventing conflicts of interest** – Suppliers will avoid even the appearance of conflicts of interest in working with Sterling and shall not allow personal or family interests to influence them in any business dealings with us. Suppliers will have policies and financial controls in place to prevent conflicts of interest affecting procurement and financial decision-making.
- **Antibribery and anticorruption:** Suppliers will not offer any form of bribery, corruption, extortion, kick back or embezzlement, will not make illegal payments directly or indirectly, and will have policies, monitoring and enforcement in place to ensure compliance with anti-corruption laws.

### 2. Labor

Sterling is committed to creating and maintaining a work environment where everyone can work, learn, and recommend ideas in a climate of mutual respect that is free of harassment and discrimination. Suppliers are expected to do the same.

- **Forced labor** – Suppliers shall not use any form of forced, bonded or involuntary labor and must comply with applicable laws combating modern slavery.
- **Child labor** – Suppliers shall not use child labor below the age of 16 or the applicable minimum legal age, whichever is higher.
- **Fair treatment** – Inhumane treatment and/or physical punishment of workers is prohibited. Suppliers shall not permit harassment or abuse of any kind.
- **Nondiscrimination, Diversity and Inclusion** – Suppliers will not permit discrimination in screening, hiring, training, promotion, compensation, or any other employment practice based on race, color, age, sex,



gender identity, gender expression, sexual orientation, ethnicity, national origin, genetic information, medical condition, pregnancy, disability, caste, religion, political affiliation, union membership, marital status, covered veteran status or any additional illegally discriminatory characteristic.

- **Wages and fringe benefits** – Work hours, minimum wages and overtime hours paid to employees as well as any fringe benefits, must be compliant with applicable regulations. Wages should be paid at regular intervals with reasonable frequency. Deductions from wages for disciplinary reasons are prohibited.
- **Freedom of association** – Suppliers should encourage their employees to communicate with their superiors concerning working conditions, compensation, etc. without fear of intimidation or harassment. Employees should be permitted to associate freely, bargain collectively, and seek representation in accordance with local laws.

### 3. Health & Safety

Suppliers must provide a safe and healthy working environment. Suppliers should have resources responsible for defining, implementing and monitoring policies and management systems that include compliance with local and national regulations. The health and safety elements should, at minimum, include:

- **Workers' health and protection** – Suppliers shall protect workers from unsafe working conditions such as exposure to physical or environmental hazards in the workplace.
- **Maintenance, emergency preparedness, and response** – Suppliers shall have programs in place to operate and maintain all operations in the safest manner possible. Suppliers shall identify, assess, and track possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.

- **On-site work** – Suppliers using Sterling facilities will comply with all applicable policies and procedures applicable to those facilities.

### 4. Protection of Sterling Information

At Sterling, protecting confidential and sensitive information is of utmost importance. Inappropriate use or disclosure of information can cause serious harm to our company, business partners, clients, and suppliers.

- **Protect confidential information** – Suppliers must keep confidential all Sterling proprietary and sensitive information. Suppliers must take precautions to safeguard this information, including that Supplier's personnel are adequately trained.
- **Data Privacy & Security** – Suppliers must comply with all applicable data privacy and security laws and regulations. Suppliers must maintain appropriate procedures, safeguards, and controls to secure and protect the confidentiality, integrity, and availability of confidential information, including personal information, received from, processed on behalf of, or disclosed by Sterling.

### 5. Internal Management Systems

Suppliers are expected to implement internal management systems with executive level commitment and accountability to ensure adherence to, and continual improvement and compliance with, these principles.

- **Maintain documentation and records** - Suppliers are expected to maintain adequate documentation and records to demonstrate they are in compliance with this code of conduct, as well as all applicable laws and regulations.

Records prepared for Sterling or maintained on behalf of Sterling must be accurate, complete, and retained in accordance with applicable legal and regulatory record-keeping requirements, or as otherwise specified in a relevant agreement between the supplier and Sterling.

## 6. Report to Sterling

Suppliers are encouraged to report violations or potential violations of this Code to Sterling by sending an email to [SupplierEthics@Sterlingcheck.com](mailto:SupplierEthics@Sterlingcheck.com).

Failure to comply with this Supplier Code of Conduct, the contract with Sterling, or any applicable laws and regulations, may result in the termination of any agreement between supplier and Sterling.