
Supplier Code of Conduct

Document Code: ACT_P_1016

Purpose Statement

ACT's Supplier Code of Conduct ("the Code") is the foundation of ACT's relationship with its suppliers, creating a mutual understanding of ACT's Guiding Principles. The purpose of the Supplier Code of Conduct is to outline ACT's compliance expectations and underscore the importance of ethics and the integrity of its suppliers. This Code is not exhaustive; suppliers are required to use their own discretion to ensure compliance with unaddressed topics and any contract terms and conditions.

Scope

The scope includes who should read the policy and who the policy applies to.

All ACT Team Members

All ACT Subsidiaries, including affiliated companies in which ACT owns or controls at least 50% or more.

All ACT Contractors (e.g., Kelly Services contractors)

Other: ACT suppliers, agents, vendors, consultants, distributors, subcontractors, and partners

(For purposes of this Code, the above checked categories are referred to as "suppliers".)

Policy

A. Introduction to ACT's Guiding Principles and Supplier Code of Conduct

ACT's reputation is one of its most valuable assets. ACT's business is built on trust. These Guiding Principles frame how ACT conducts business:

- x Holistic - ACT assesses and appreciates each person's unique traits and skills, to help navigate toward college and career success. 7.3(lis752s)]TJ 0 Tc 0 Tw 12.576 0 Td ()Tj(n/MCID 23 >>BDC /C2_-2 Tf

- x When a supplier, directly or indirectly, through business, investment, or its directors, officers, or employees, owns or holds a financial interest in an ACT competitor, another supplier, vendor, subcontractor, customer, other ACT business partner, or other party with whom ACT has or is negotiating a transaction or arrangement.
- x When a director, officer, or employee of the supplier serves as a director, officer, consultant, or employee of, or performs services for, an ACT competitor, another supplier, vendor, subcontractor, customer, other ACT business partner, or other party with whom ACT has or is negotiating a transaction or arrangement.
- x When an ACT team member, director, or officer serves as a director of, holds another leadership position at, or owns or hold a financial interest in the supplier.

If at any point there is an existing or potential conflict of interest between a supplier's interest, duties, obligations, or activities and its responsibilities to ACT, ACT must be notified immediately. ACT will then review the existing or potential conflict of interest and determine its relevance and how to appropriate resolve or handle it.

D. Protection and Proper Use of ACT Assets

Suppliers must respect ACT intellectual property rights, including processes, information, and technology. Suppliers are required to take the necessary precautions to safeguard ACT assets, including intellectual property, data, and records.

E. Confidentiality

Suppliers may learn confidential or proprietary information about ACT, its customers, prospective customers, other suppliers, and other third parties. Suppliers must:

- x Maintain the confidentiality and security of ACT confidential information; and
- x Comply with ACT policies and legal requirements regarding the collection, protection, use, transfer, and disclosure of confidential information.

F. Gifts and Anti-Bribery

- x Gifts and Gratuities

Gifts and gratuities may involve anything of value –

business, in which countries they may do business with or for ACT, how ACT information or products are transferred between countries, and any necessary government approvals.

* Accessibility

Suppliers creating digital content in the form of web pages, web applications, tests, test content, software code, software, documentation or other deliverables for ACT must be designed to meet the minimal technical standards for accessibility specified by ACT, including the requirements of Level AA success criteria of the Web Content Accessibility Guidelines (WCAG) 2. as published by the World Wide Web Consortium's Web Accessibility Initiative. Suppliers must inform ACT of any accessibility concerns related to the services or products provided by Supplier, which might impact the accessibility of ACT's products and services.

+ Fairness

x Fair Dealing

Suppliers are expected to deal fairly with ACT's customers, other suppliers, competitors, other third parties, and team members. Suppliers should not take unfair advantage of anyone through the manipulation, concealment, or

- x A live conversation by calling toll free 1.877.777.7296. (If calling from outside the U.S., locate the applicable phone number on the [Ethics Portal](#).)
- x Text the word “Report” to 319.250.5667.
- x Submit through an [online reporting](#) tool.