



Wilson Language Training

Supplier Code of Conduct

Last Updated: August 20, 2025

Purpose

Wilson Language Training (referred to as “we”, “our”, “us”, or “Wilson”) is committed to empowering educators with science-based and research-backed literacy programs to help students become fluent and independent readers. Wilson has created this Supplier Code of Conduct (“Supplier Code” or “Code”) as an extension of our own Code of Ethics to form the cornerstone of our commitment to responsibly source our goods and services. This Supplier Code applies to all third parties with whom Wilson’s annual spend exceeds \$50,000 that provide goods or services to Wilson (“Suppliers”). Under this Code, we expect our Suppliers to commit to and uphold the same high standards of social and environmental responsibility to which we hold ourselves.

Business Ethics and Integrity

Compliance with Laws

Wilson is committed to conducting business ethically and lawfully in countries where we operate across our supply chain. We conduct business with Suppliers who demonstrate a strong commitment to ethical behavior and expect our Suppliers to comply with applicable laws, rules, regulations, and codes of the countries and jurisdictions in which they do business. They must also comply with all other applicable international laws and regulations, including those relating to international trade, sanctions, export controls, antitrust/competition, and privacy and data protection.

Bribery/Corruption and Gifts/Entertainment

All forms of bribery, kickbacks, corruption, extortion, embezzlement and unethical practices are prohibited, and Suppliers must have a zero-tolerance policy and prohibit such behavior. Suppliers shall refrain from offering gifts and/or excessive hospitality to Wilson employees or its designated representatives which may inappropriately influence, or perceive to influence, Wilson’s business decisions or gain an unfair advantage.

Competition and Conflicts of Interest

Suppliers’ business dealings should be fair, legal, and honest. Suppliers must not engage in illegal cooperation with competitors including bid rigging, price fixing, market allocations, or any other prohibited conduct that limits free and fair competition. Suppliers must not make any gifts or payments to public officials with the intent to improperly influence any public officials or otherwise in violation of applicable laws. Suppliers will also declare any conflict of interest in any business

dealing with Wilson and will actively seek to avoid such conflicts and the appearance of such conflicts.

Confidential and Proprietary Information

Wilson's confidential information and intellectual property must be safeguarded and must not be shared with any third party unless expressly permitted by Wilson. Any authorized transfer of confidential information shall be done in a way that protects intellectual property rights.

Environment

Wilson is committed to reducing its environmental impact across our supply chain and to supporting sustainable operational and agricultural production practices. Wilson strives to work with Suppliers that integrate sustainable practices into their business whenever possible. Suppliers must act in an environmentally responsible manner and comply with all applicable environmental laws, rules, codes, and regulations including those related to waste disposal (including hazardous waste), air emissions, wastewater and effluents, and toxic substances for the regions in which they conduct business. This includes compliance with all reporting, permitting, and environmental licensing requirements.

Paper Vendors

All Wilson paper vendors must ensure that paper and paperboard supplied to Wilson must be in compliance with the U.S. Lacey Act, which makes it unlawful to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any plant, including trees, taken in violation of the laws of a U.S. State or any foreign law that protects plants. Wilson prohibits sourcing from Indonesian tropical forests, old growth and/or endangered forests. Wilson prohibits sourcing of any goods, including raw materials and paper, that have been harvested, manufactured, processed, or produced in whole or in part from convict, forced or indentured labor. **Wilson maintains preferred procurement practices for vendors that are Forest Stewardship Council (FSC) certified. For our print suppliers, we expect you to comply with the Manufacturing Standards and Specifications for Textbooks (MSST), if applicable to your services.**

Human and Labor Rights

Forced Labor, Human Trafficking and Child Labor

Wilson is committed to a work environment that is free from human trafficking, slavery, and forced labor. Suppliers must not engage in any practice that constitutes trafficking in persons or slavery and must only utilize voluntary labor by workers who are allowed freedom of movement. Wilson does not tolerate child labor in its supply chain. Suppliers are prohibited from (i) using child labor, defined as any work performed by children less than 15 years of age or (ii) using children under 18 years of age to engage in hazardous work.

Working Hours, Compensation, and Benefits

Wilson is committed to upholding applicable laws and collective bargaining agreements regarding working hours, wages, benefits, and paid leave for individuals employed throughout the supply chain. Suppliers shall fairly compensate all employees with wages, overtime premiums, and benefits that meet or exceed all applicable legal requirements or collectively bargained agreements. Wilson expects its Suppliers to comply with all applicable wage and hour laws, and rules and regulations, including minimum wage, overtime, and maximum hours.

Health and Safety

Wilson is committed to operating its facilities in a manner that protects human health and safety as well as the environment. Suppliers are expected to provide a safe, clean, and healthy working environment that minimizes exposure to accidents and injuries to their employees and the communities in which they operate and that complies with all applicable laws pertaining to health and safety in the workplace.

Supplier Compliance

Suppliers are required to comply with this Supplier Code as a condition of doing business with Wilson. Additionally, Supplier must be able to demonstrate compliance with this Supplier Code upon our request, and we expect you to take action to correct any non-compliance. Wilson reserves the right to verify compliance with the Supplier Code, at the Supplier's own expense, through internal and external assessment mechanisms, such as self-assessment questionnaires and internal or third-party audits. If Wilson determines that any Supplier has violated this Supplier Code, Wilson may, at its discretion, either terminate its business relationship or require the Supplier to implement a corrective action plan within a timeframe agreed upon between the Supplier and Wilson.

No Discrimination; Supplier Diversity

Wilson expects suppliers to foster inclusive workplaces; discrimination of any kind is not tolerated. Suppliers must operate workplaces free of discrimination, harassment, and abuse, including race, gender identity, sexual orientation, disability, or any other protected classes.

Wilson actively promotes relationships with small, diverse, and underrepresented businesses. Suppliers are expected to use unbiased and transparent search and assessment processes, provide fair access to bids for diverse businesses, and to seek out opportunities for diverse suppliers to participate in business opportunities.

Continuous Improvement

Wilson is committed to constant improvement in its business and operations and expects Suppliers to continuously improve their performance in line with this Supplier Code.