



EBSCO Information Services Employee Code of Conduct

EBSCO Information Services (EBSCO) is a customer-focused, results-oriented company with a culture characterized by open communication, fact-based decision making and accountability. We treat each other with trust and respect.

Our culture is supported by a commitment to fostering the following individual traits in our workforce

- ✓ Drive
- ✓ Positive Attitude
- ✓ Eagerness to Understand
- ✓ Sound Judgement

and the following organizational traits for our company.

- ✓ Collaboration
- ✓ Open Communication
- ✓ Accountability
- ✓ Trust and Respect

Issued: 02/2020

1

EBSCO recognizes that our team members must adhere to certain basic practices in order to drive our culture, support our values and to meet our commitment to high ethical standards. Our Code of Conduct sets out these basic practices and serves as a foundation for our company policies and procedures, which provide additional guidance on expected behaviors. EBSCO is committed to accountability, which means that each of our employees is responsible for operating with high performance and high integrity, in compliance with our Code of Conduct. This also means that if you are in a situation or are aware of a situation that you believe may violate our Code of Conduct, you have a responsibility to speak up. If you violate the law, our Code of Conduct or policies, you may be subject to disciplinary action, up to and including termination. We must do what we say we will do.

We act with integrity

- At all times during the conduct of EBSCO's business both on and off EBSCO property, we perform our job functions to the best of our ability, remembering that everything we do in the performance of such functions has a direct impact and reflection on the well-being of EBSCO.
- We comply with all laws, regulations and policies issued by governmental units, regulatory agencies and EBSCO while avoiding any action that may harm EBSCO or our profession. We will not only do what is legal, but what is right.
- We always act in the best interest of EBSCO and do not permit outside interests to interfere with our job duties or influence our actions on behalf of EBSCO.
- We don't offer bribes, accept bribes or let others bribe for us. We do everything we can to prevent bribery by others who conduct business on our behalf.
- We are honest and truthful in all professional and business relationships.
- We compete in a fair and honorable manner to earn the customer's trust and business.
- We deal fairly with EBSCO's customers, suppliers, partners, service providers, and employees.

We treat each other with dignity and respect

- We support and promote a workplace environment free from discrimination based on race, skin color, religion, creed, sexual orientation, disability, gender, age, national origin, citizenship status, marital status, veteran status or any other legally protected characteristic.
- We each act with regard for the safety and well-being of ourselves and all other persons affected by our job performance.
- We respect the rights of every individual and abide by the employment laws in the markets where we operate. We support the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of children, physical punishment, forced or prison labor or human trafficking.

We promote the protection of company assets, including corporate opportunities and confidential information

- We only use EBSCO resources and property for business purposes unless otherwise authorized by EBSCO management.
- We use resources wisely, remembering EBSCO has entrusted each of us as the steward.
- Confidential information and intellectual property represent the outcome of significant company investment and years of hard work. We treat all non-public and proprietary EBSCO information (regardless of its source) as confidential, and don't disclose it to people outside of our organization unless it is (i) necessary, (ii) we are authorized to do so, and (iii) we have taken the appropriate steps to secure the information. We never disclose confidential information for our own or others' private benefit. Your responsibility to protect EBSCO information does not end when you leave EBSCO but continues even if you leave our company.

- We respect confidentiality obligations to third parties, including former employers, competitors, customers, and suppliers.
- We will advance EBSCO's interests when the opportunity arises and will not advance our own interests or the interest of others at EBSCO's expense.

REPORTING CONCERNS

If you think someone is acting in a way that is inconsistent with this Code of Conduct, then it is important that you take action. You have several choices:

- You can report concerns to your manager.
- You can contact a member of your HR team.
- You can report matters to EBSCO's ethical reporting hotline – [ebscointegrity.com](https://www.ebsco.com/ethics)

EBSCO does not tolerate retaliation against any employee who makes a report in good faith.

ADMINISTRATION OF THIS CODE

As a global company, there may be limited circumstances where local law or other legal requirements differ from the standards set forth in our Code. We comply with applicable local laws and our Code. Where there appears to be a conflict, you should typically comply with the more restrictive requirement. However, if a cultural norm violates our core values or if the right course of action is not clear, contact your manager, your HR team, or a member of Legal Services for guidance. If you become aware of a conflict between our Code and other legal requirements, please contact a member of Legal Services.

CONDUCT NOT PROHIBITED BY THIS CODE

While we expect you to follow our Code, we also recognize your rights as an EBSCO employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code or in any EBSCO policy is intended to limit or interfere with your rights under the law.

Issued: 02/2020