

# LevelBlue Supplier Code of Conduct

Date: January 14, 2026

LevelBlue is committed to operating with the highest standards of integrity, emphasizing data privacy, security, and ethical business practices. Suppliers are a key part of our business and therefore an integral part of our approach to corporate social responsibility. Any third party, individual, or entity, including but not limited to subcontractors, consultants, suppliers, agents, partners, distributors, temporary workers, and vendors (collectively, “**Suppliers**”) that seeks to provide any service or product to LevelBlue must comply with all applicable laws and regulations, including U.S. federal, U.S. local, and any relevant foreign laws, as well as the requirements set forth in this LevelBlue Supplier Code of Conduct (“**Code of Conduct**”). LevelBlue further expects its Suppliers to ensure that their respective downstream suppliers and vendors comply with the standards set forth in this Code of Conduct (“**Standards**”).

## Ethics

LevelBlue demands the highest standards of ethics from our Suppliers. Suppliers are expected to develop and maintain anti-bribery and anti-corruption policies consistent with applicable industry standards and regulatory requirements. Suppliers are prohibited from engaging in bribery or any corrupt practices to advance interests with LevelBlue. This includes directly or indirectly offering, promising, or authorizing, or providing money or anything of value to government officials, political parties, or candidates for political office for the purpose of influencing any act or decision.

Suppliers must not engage in illegal activities, including, but not limited to money laundering, human trafficking, terrorism-related activities, or conducting business with parties or persons sanctioned by the U.S. Government. Without LevelBlue’s prior written approval, Suppliers are prohibited from contacting legislators, federal or state regulatory officials or their staff, or from making political contributions on behalf of LevelBlue. Suppliers may not contact any foreign government agency or official on behalf of LevelBlue without LevelBlue’s express prior written consent. LevelBlue also prohibits the use, possession, distribution, or sale of illegal substances at any time while LevelBlue business is being conducted.

## Conflicts of Interest

LevelBlue awards vendor contracts based on product and service performance, cost, quality, and other factors we deem appropriate. Suppliers should not have a relationship

with any LevelBlue employee that affects or may appear to affect such employee's judgment or appears to be a conflict of interest.

### **Company Property and Resources**

LevelBlue's property and resources are highly valuable. Suppliers are responsible for protecting LevelBlue's tangible and intangible property and ensuring its legitimate use. LevelBlue's property or resources may not be taken, sold, loaned, given away, licensed, assigned, damaged, or otherwise disposed of regardless of its condition or value without LevelBlue's express written authorization.

### **Confidential Information and Privacy**

LevelBlue values and protects its confidential and proprietary information and expects its Suppliers to do the same. LevelBlue may require Suppliers execute a non-disclosure agreement before providing them access to confidential or proprietary information.

Any Supplier or other third party with authorized access to LevelBlue customer information is required to comply with all applicable laws, regulations, and LevelBlue requirements, as well as LevelBlue's Data Protection Addendum. Additionally, LevelBlue's Privacy Policy, which explains how we collect, use, and protect information, contains certain commitments Suppliers must adhere to, such as:

- Keeping our customers' information safe using encryption or other appropriate security controls.
- Keeping our customers' personal information only for the length of time that it is needed for business, tax, or legal purposes.
- Maintaining a written retention schedule or policy that complies with law.
- Restricting the disclosure, marketing, or otherwise selling of customer information.

### **Artificial Intelligence**

Suppliers must adhere to the highest industry standards of responsible and ethical practices throughout the development and use of artificial intelligence (AI). Suppliers must ensure that any development or use of AI systems in the performance of services for LevelBlue complies with all applicable laws, regulations, contractual obligations, and is subject to and approved through a LevelBlue AI privacy and security assessment. Suppliers must not use LevelBlue or LevelBlue customer data in the development or training of any AI or machine-learning model without LevelBlue's express written authorization.

## **Sustainable Business Practices**

LevelBlue expects Suppliers to engage in continuous improvement processes aimed at enhancing economic, social, and environmental conditions. This may include using innovative products and services, preventing wasteful practices, improving energy efficiency, reducing total cost of ownership, reducing greenhouse gas emissions, adopting more sustainable packaging, reducing water use, creating end-of-life recycling alternatives, ensuring adequate treatment of hazardous waste, and reducing the total use of substances of concern. Suppliers must strive to minimize the environmental impact of their products and services, including by reducing or eliminating the existing use of hazardous substances in products supplied to LevelBlue.

## **Environment, Health, and Safety**

LevelBlue expects Suppliers to develop and maintain robust environment, health, and safety (EH&S) policies and practices. Suppliers should also provide a safe and healthy workplace that complies with international and national standards, laws, rules, and regulations, as applicable. Suppliers must provide appropriate health and safety information and training to their employees. LevelBlue expects Suppliers to minimize the impact of emergency events by proactively using and maintaining business continuity plans and emergency response procedures.

## **Supplier Inclusivity**

LevelBlue values growth within underrepresented US businesses and communities, including the following:

- Setting inclusive spending goals.
- Involving certified and small businesses where possible and appropriate.

## **Freedom of Association and Collective Bargaining**

LevelBlue expects Suppliers to respect its own employees' rights to join worker organizations, such as collectively bargained trade unions or similar external representative organizations.

## **Labor Practices**

Suppliers are prohibited from using or being complicit in human trafficking or modern slavery, involuntary labor, child labor, prison labor, debt bondage, or indentured or forced labor. No person employed by a Supplier may be below the minimum legal age for employment pursuant to applicable local law or international law. Suppliers must comply with all applicable labor, wage and hour laws, and regulations, including, but not

limited to, those relating to minimum wage, overtime, piece rates and other elements of compensation, and legally mandated benefits.

## **Human Rights**

LevelBlue expects Suppliers to treat all employees, customers, and the general public with respect and dignity and provide formal channels for their employees or consumers to report grievances. Suppliers should institute standards to pay competitive, fair, and equitable wages, cap maximum working hours and, where applicable, provide acceptable living conditions. LevelBlue vehemently rejects any use of corporal punishment, threats of violence, physical abuse or other forms of physical coercion, harassment, or intimidation. Suppliers' employment, wage and benefits practices cannot discriminate based on color, race, caste, religion, age, maturity, nationality, social or ethnic origin, status, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, union membership, or disability. We also expect Suppliers to work toward having a diverse workforce.

## **Conflict Minerals**

LevelBlue is not a manufacturer, but we care about the usage of conflict minerals. We expect the products we purchase will not contain conflict minerals that directly or indirectly support non-state actors engaged in armed conflict, human trafficking, exploitative mining practices, terrorism, drug trafficking, or contribute to human rights violations in conflict-affected regions. We expect our Suppliers share this commitment and exercise diligence in their sourcing practices, in accordance with applicable conflict mineral laws and regulations.

## **Report Violations**

Suppliers shall immediately report any and all violations of this Code of Conduct to the LevelBlue Legal Department at [legal@levelblue.com](mailto:legal@levelblue.com).