



Social Compliance Code of Conduct

Excelligence Learning Corporation and its subsidiaries (together, "Excelligence") are committed to principles of human rights and social compliance, particularly as it relates to involuntary labor of any kind, including child and indentured labor, human trafficking and slavery.

Our Code of Conduct outlines the basic requirements with regard to working conditions and must be satisfied by each supplier within our supply chain. In addition, suppliers must ensure that their contractors/suppliers adhere to these same Code of Conduct requirements.

All references to "applicable laws and regulations" in this Code of Conduct includes all local, national and international laws, codes, rules, directives, regulations and treaties.

Involuntary Labor: Suppliers shall not use involuntary labor, defined as work or service which is extracted from any person under threat or penalty for its non-performance and for which the worker does not offer voluntarily.

Child Labor: Suppliers shall not use child labor. No person under the age of 15 years is to be employed by the factory. If any applicable law or regulation has a more restrictive definition of child labor, then the more restrictive definition shall apply.

Human Trafficking: Suppliers must comply with all applicable laws and regulations relating to human trafficking and slavery. In addition, there is to be no engagement in the recruitment, transportation, transfer, harboring or receipt of persons by means of threat or use of force. Suppliers must not use threat of force, coercion, abduction or abuse the power of position over another person. Suppliers must not engage in forced labor or services, slavery or practices similar to slavery or servitude.

Working Hours: Suppliers must adhere to all applicable laws and regulations pertaining to working hours and overtime must be consensual. Unless extraordinary circumstances exist, the sum of regular and overtime hours in a week shall not exceed 60 hours, and suppliers shall guarantee that employees receive at least 24 consecutive hours of rest during each seven day period. If an applicable local law differs, suppliers must follow the stricter requirement.

Health and Safety: Suppliers must provide workers with a safe and clean work environment and comply with all applicable laws and regulations governing workplace health and safety. Factories must have safety procedures and equipment in place to prevent accidents and injuries to employees. Access to clean drinking water, washing facilities and an appropriate number of toilets is required.

Compensation: Suppliers must provide fair compensation and benefits to all employees in accordance with applicable laws and regulations and overtime must be calculated at the legally required rate.

Hiring and Disciplinary Actions: Suppliers must accurately verify workers' age and legal right to work within the country prior to employment. Employees must be treated fairly and with dignity and respect. There is to be no use of corporal punishment or any form of physical or psychological coercion, intimidation or violence.

Nondiscrimination: Suppliers shall not discriminate against their employees in employment, including hiring, salary, benefits, advancement, discipline, termination, or retirement on the basis of gender, race, religion, age, disability, sexual orientation, nationality, marital status, political opinion, trade union affiliation, social group, ethnic origin, or any other status protected by law.

Dormitories and Dining: Suppliers and factories that provide residential and dining facilities for their employees must provide a safe, healthy and clean environment. All such facilities shall have safety provisions such as fire extinguishers, first aid kits and emergency exits. In addition, factories should also have security measures to protect employees and their property.

Excelligence has the right to monitor compliance with this policy through the unannounced inspection of facilities by either third party monitors or Excelligence representatives. Suppliers are required to maintain on site documentation regarding their compliance with these standards and must permit full access to facilities for the inspection of employee records.