

# Circana Vendor Code of Conduct

Version 2  
March 2026

It is essential that the employees of Circana, Inc. and its subsidiaries (the “Company” or “Circana”) always conduct themselves with integrity and in full compliance with the laws and regulations that govern our global business activities. To that end, the Company has established a set of company standards of business practices and regulatory compliance that are set out in the Circana Global Code of Conduct which applies to all Circana employees, directors, and officers. The Code of Conduct is an extension of our values and reflects our commitment to ethical business practices and regulatory compliance. We encourage our vendors to review this policy located on our website at [www.circana.com](http://www.circana.com).

Circana expects that its vendors, suppliers, partners, and other third parties (hereafter “Vendor” or “Vendors”) will share and embrace the letter and spirit of our commitment to integrity. This Vendor Code of Conduct (the “Code”) sets forth the standards to be followed in all business activities conducted for and/or on behalf of Circana. The Code applies to all Circana Vendors and their employees, agents, and subcontractors (“Representatives”). Vendors are responsible for taking all reasonable steps to ensure that their Representatives perform their activities in accordance with this Code and should educate their Representatives to ensure they understand and comply with the Code. All Vendors and their Representatives must conduct their business activities in full compliance with applicable laws and regulations. Further, they shall:

### **Employment and Labor Rights**

1. Conduct their employment practices in full compliance with all applicable laws and regulations.
2. Cooperate with Circana’s commitment to a workforce free of harassment and unlawful discrimination.
3. Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, or prison labor by a Company Vendor or its Representatives is prohibited.

4. Comply with all local minimum working age laws and requirements and not utilize child labor.
5. Pay living wages under humane conditions and in accordance with applicable laws.
6. Do not require workers to work more than the maximum hours of daily labor set by applicable laws; ensure that overtime is voluntary and paid in accordance with applicable laws and regulations.
7. Keep employee records in accordance with local and national regulations.
8. In accordance with local law, Vendors shall respect the right of all workers to form and join trade unions, bargain collectively, and to otherwise lawfully engage in peaceful assembly.

### **Ethics and Integrity**

1. Comply with the anti-corruption laws of the countries in which it does business, including the United States Foreign Corrupt Practices Act and UK Anti-Bribery Act.
2. Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
3. Comply with the intellectual property ownership rights of Circana and others, including but not limited to copyrights, patents, trademarks, and trade secrets.
4. Avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of Circana. To that end, Vendors or their Representatives shall not deal directly with any Circana employees whose spouse, domestic partner, or other family member or relative has a financial interest in the Vendor (other than ownership of less than one percent (1%) of the vendor's publicly traded outstanding shares).

5. Avoid insider trading by buying or selling Circana or another company's stock when in possession of information about Circana or another company that is not available to the investing public and that could influence an investor's decision to buy or sell stock.
6. Use good judgment, discretion, and moderation when offering gifts or entertainment to Circana employees.
7. Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion, accuracy, retention, and disposal.

### **Environmental, Social and Governance (ESG)**

1. Provide a safe and healthy work environment, have reasonable procedures to detect, prevent and handle potential risks to the health, safety, and security of its employees, and follow all applicable laws, regulations and practices related to health and safety in the workplace.
2. Operate in an environmentally responsible manner. Vendors must ensure compliance with all applicable local, national, regional, and international laws and regulations relating to environmental protection within the countries where they carry out their activities.
3. Abide by Modern Slavery and Human Trafficking prevention laws including, without limitation, the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Australia), and not use underage labor.
4. Ensure that illegal child labor is not used in the performance of any work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.
5. Treat all personnel fairly and respectfully and ensure that they are not complicit in human rights abuses. Employees must not be subjected to inhumane treatment, including abusive, violent, threatening, disruptive, physical, and other improper behavior.

6. Prohibit the use, possession, distribution, and sale of illegal drugs while on Circana or Vendor-owned, leased, or managed property.

### **Privacy and Data Protection**

1. Maintain internal policies and procedures reasonably designed to protect data provided by Circana or obtained by the Vendor on behalf of Circana or its clients (“Circana data”). Vendors shall comply with all applicable privacy, data protection, and information security laws and regulatory and judicial requirements regarding the collection, storage, processing, transmission, or disclosure of Circana data.

### **Reporting Concerns and Potential Misconduct**

If Vendor or its Representative wishes to report any questionable behavior or possible violation of Circana’s Code of Conduct or this Vendor Code of Conduct, the Company has a variety of resources available to assist you. You are encouraged to work with your primary Company contact in resolving a business practice or compliance concern. However, Circana recognizes that there may be times when this is not possible or appropriate. In such instances, please contact any of the following:

The Integrity Line, maintained by an independent service provider, is available 24/7 at +1 (800) 461-9330 (PIN: 8018). You may also file a report online at <https://circana.integrityline.com>.

The telephone number for parties outside the U.S. can be found on our website. Reports processed over the phone or online can be done anonymously depending on the country you are calling from. Reports made to the Integrity Line are sent to the Company for further investigation.

You may also contact the Circana Legal Department at:

General Counsel, 203 N. LaSalle Street, Suite 1500, Chicago, IL 60601

Telephone: 312.726.1221

Email: [General.Counsel@circana.com](mailto:General.Counsel@circana.com)



Circana will not tolerate any retribution or retaliation taken against any individual who has in good faith sought out advice or has reported questionable behavior or a possible violation. We thank you for your compliance with this important policy and look forward to a mutually beneficial relationship with all of our vendors based on the highest levels of ethical behavior.