



Supplier Code of Conduct



At Chegg, we are committed to the highest standards of ethical conduct in our relationships with one another, our customers, our stockholders, and our suppliers and partners. We seek to develop and strengthen partnerships in line with that commitment, and we expect those we do business with to adhere to these same standards. This Supplier Code of Conduct (“**Supplier Code**”) details Chegg’s expectations of its suppliers and provides the appropriate guidance based on a shared understanding of commitment to transparency, integrity, collaboration, and mutual respect.

Conducting Business with Integrity

ETHICS AND LEGAL COMPLIANCE

We expect our suppliers to share our commitment to ethical business practices and following the law, which includes maintaining the appropriate policies and procedures to reinforce a culture of ethical compliance.

ANTI-BRIBERY AND CORRUPTION

Chegg does not tolerate bribery or corruption and we expect our suppliers to conduct their business in the same way. Suppliers must not offer, promise, or give anything of value (including but not limited to gifts, travel, entertainment, and charitable donations) to anyone to influence business decisions or gain an unfair advantage related to any Chegg business. We also expect Chegg suppliers to maintain accurate records and maintain transparency regarding their business dealings and comply with applicable anti-bribery and corruption laws.

INSIDER TRADING

Insider trading is illegal and unethical. Suppliers are obligated to comply with all applicable insider trading laws, and should not engage in insider trading, including providing material Chegg nonpublic information to others who may use it for trades. Additionally, suppliers must ensure that employees, contractors, and agents do not engage in insider trading.

ANTI-MONEY LAUNDERING

Chegg does not tolerate any business transaction or activity that would directly or indirectly support criminal acts or violate anti-money laundering or terrorism financing laws. We require all suppliers to comply with all applicable laws and regulations and to have adequate controls in place to prevent such illegal activities from occurring.

DATA PRIVACY AND SECURITY

Our suppliers must comply with all applicable data privacy laws, regulations, and best practices, and follow processes that ensure the security and integrity of personally identifiable information, confidential information, and any other type of sensitive information that may be received from Chegg.

CONFIDENTIAL INFORMATION

Throughout the course of business, suppliers may receive confidential information, including trade secrets and proprietary information. All suppliers are required to maintain the privacy of any confidential information received, and only use that information for the purpose for which it was provided. Suppliers must also take reasonable measures to protect such information from unauthorized access, use, or disclosure.

TRADE SANCTIONS

As part of Chegg's expectation that all suppliers uphold the law, suppliers must ensure compliance with applicable trade laws including, but not limited to, U.S. sanctions regulations administered by the U.S. Treasury Department's Office of Foreign Assets Control, sanctions regulations administered by the European Union, local authorities in the European Union, and the United Kingdom, and similar applicable laws in any other jurisdictions where suppliers conduct business with Chegg.

FAIR COMPETITION

Suppliers are expected to deal fairly and honestly with customers, suppliers, employees, and any related party while conducting business with Chegg, which includes full compliance with antitrust and fair competition laws. We also expect suppliers to avoid agreements or actions that unfairly restrain trade, restrict competition, or violate antitrust or competition laws.

Labor Standards and Social Responsibility

MODERN HUMAN SLAVERY AND CHILD LABOR

Chegg is committed to protecting and advancing human rights and has zero tolerance for the use of child and/or forced labor, slavery, and human trafficking. All suppliers are required to uphold this commitment and we expect anyone working with Chegg to immediately report any suspected human rights abuse.

COLLECTIVE BARGAINING

We respect the rights of individuals to freely associate, form, and join trade unions and engage in collective bargaining, and expect our suppliers to do the same. Chegg suppliers must not interfere with or obstruct the rights of its employees to form or join trade unions and are required to comply with all applicable and related laws and regulations.

HEALTH AND SAFETY

Providing safe, healthy, and humane working conditions for employees is a requirement to do business with Chegg. We expect all suppliers to comply with all applicable occupational health and safety, working hours, wages, and benefits laws, regulations, and requirements. Suppliers are also responsible for taking proactive measures to identify and address any potential health and safety risks in the workplace and implement appropriate programs to promote employee well-being.

NON-DISCRIMINATION AND HARASSMENT

Chegg expects all suppliers to share our commitment to creating a workplace that is free from discrimination and harassment. Suppliers must comply with all applicable laws, regulations, and standards related to non-discrimination and harassment, and should not discriminate against employees based on any characteristic, protected or otherwise. We also expect that suppliers will maintain the appropriate policies and procedures to report and address incidents of discrimination and harassment.

ENVIRONMENTAL STANDARDS

Chegg suppliers are expected to comply with all relevant environmental laws and regulations, and act in the most environmentally responsible way possible. This includes accurate environmental reporting as required by local government regulations and maintaining transparency in environmental practices.

HUMAN RIGHTS

As described in our [Human Rights Policy](#), and consistent with the Universal Declaration of Human Rights, we support the fundamental protection of human rights and protection against discrimination, harassment, or abusive behavior, which also applies to our suppliers.

Procedures

MONITORING AND COMPLIANCE

Suppliers are expected to comply with any reasonable requests for information related to ensuring compliance with this Supplier Code. If a supplier is found to be in violation of this Supplier Code, we expect the supplier to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. This obligation extends to breaches of applicable law or regulation. Failure by a supplier to do so or commit to a plan to achieve compliance may lead to review or termination of our relationship.

This Supplier Code is also subject to regular review and change as appropriate and in line with applicable laws and standards.

REPORTING VIOLATIONS

Suppliers should immediately report any suspected or actual violations of this Supplier Code. Reports or concerns may be submitted via Chegg's compliance hotline by [phone](#) or the Chegg [online reporting platform](#) managed by EthicsPoint.