



Code of Conduct

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A Note from Jen Welding

Dear Colleague,

Ellucian's Code of Conduct is our guiding framework and tool to ensure that we maintain our role as a trusted partner, to conduct business responsibly and to remind us that every action counts. Nothing is more important to Ellucian than making sure we do what is right. Our most valuable asset, both as individuals and as a company, is our reputation.



We believe that Ellucian employees are fully capable of making the right choices and that they will be guided by their good judgment. However, we don't want anyone to have to "go it alone" when we are unsure of what is the right thing to do. One of the responsibilities we all share is to seek guidance from our managers or other internal sources when we need it. You must take the LEAD and speak up or ask questions if you see anything that appears to breach this Code. Your concerns will be considered seriously—and Ellucian will not tolerate retaliation against anyone who in good faith reports conduct that may be inconsistent with the Code or who participates in an investigation.

Our values and behaviors are the foundation for our Code. We best serve our customers, our investors and ourselves by adhering to the highest standards of ethical behavior and by maintaining an environment that is fair, open and honest. Our reputation and our success depend upon the personal commitment that each of us makes to uphold Ellucian's values and to practice ethical behavior in all of our business dealings.

All of us, regardless of employment level, position, or geographic location, are expected to uphold the standards of business conduct outlined in this Code. This is why we ask each Ellucian employee to make a personal commitment to follow our Code. Do not allow anything—not "making the numbers," competitive instincts or even a direct order from a superior—to compromise your commitment to integrity. Ellucian leaders are responsible not only for their own actions, but for fostering a culture in which compliance with the Code and applicable law is at the core of our activities. As we focus on solidifying Ellucian's position as the leader in higher education technology, we must recognize that only one kind of performance will maintain our reputation, increase our customers' confidence in us and our products and services, and enable us to continue to grow—and that is performance with integrity.

Sincerely,

Jen Welding, Chief Compliance Officer

Our Code, Our Responsibility

Our Code is a public statement that Ellucian is committed to doing the right thing wherever we are in the world. It serves as a valuable resource to help employees and others make informed, ethical decisions.

Our Code includes references to relevant Ellucian policies, procedures and practices and other helpful tools and resources. Because no code of conduct can cover every possible situation, Ellucian relies upon you to use good judgment and to speak up when you have questions or concerns.

Operating in more than 50 countries, as we do, means there may be times when local laws, regulations or customs conflict with our Code. Whenever there is a conflict or a difference between an applicable legal requirement and our Code, you must apply the strictest standard. Do not follow customs that violate our Code. **Check with the Chief Compliance Officer if you have any questions.**

Who Must Follow Our Code

Our Code applies to all Ellucian employees, officers, and members of the board. Business partners, including distributors, resellers, channel partners, and other third parties, can have a direct impact on our reputation through their behavior. For this reason, we want to work with business partners who share our commitment to safety, ethics and compliance. We expect and encourage all third party contractors we work with and their employees to act in a way that is consistent with our Code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

Employee Responsibilities

- Read and be familiar with the information in our Code.
- Certify annually that you have acted in accordance with our Code.
- Act in a manner that is safe, ethical, and consistent with applicable laws and regulations, Ellucian requirements, and Ellucian values and behaviors.
- Raise questions and concerns if you become aware of possible violations of laws, regulations, our Code or Ellucian policies.

LEAD

If you have questions about the right thing to do, it is important to ask questions or raise concerns. If you think an actual violation of this Code has occurred or could occur, it is important that you come forward and report your concerns immediately, even if you choose to do so anonymously.

Misconduct cannot be justified by claiming it was ordered by someone in higher management. No one, regardless of level or position, has the authority to direct conduct that is illegal or that violates this Code.

Additional Responsibilities of Managers

- Lead by example. Be a positive role model and support Ellucian employees by:
 - Creating an environment that is respectful and inclusive.
 - Encouraging people to speak up.
 - Listening and responding to concerns when they are raised.
- Do your part to make sure that no one experiences retaliation for speaking up or cooperating in an investigation.
- Help Ellucian team members understand the principles and expectations of our Code, Ellucian policies and applicable laws.
- Be consistent when enforcing our requirements and holding people accountable for their behavior at work.
- Report any actual or potential violations of this Code to your manager, the People team, the Chief Compliance Officer, General Counsel or the Alert Line. You should not independently investigate conduct that may be illegal or violates the Code.



Our Code is a foundation for ethical business conduct. The Code is not a substitute for good judgment and cannot cover every situation you may encounter. If you are ever faced with an uncertain situation, consider the following:

- Does the conduct comply with the Code and other Ellucian policies?
- Is the conduct legal, ethical and socially responsible?
- Does it feel right?
- Is there someone I should consult for advice or approval?
- How would the person I respect the most view this decision?
- How would this look in the media and to our investors?

Does The Code Apply to Me?

Each employee and board member of Ellucian is required to follow our Code and our supporting policies as part of their employment or service. In some cases, local laws may be more stringent than the Code. In other cases, we may establish policies or practices that are more stringent in particular regions and that requires more of you than the Code requires. If so, you must comply with the local law, or the more restrictive regional policy or practice. In addition, each employee should make reasonable efforts to ensure that any third party consultants with whom Ellucian does business are aware of the Code as applicable to the particular transaction or relationship.

When Should You Speak Up?

Lead by speaking up if you see something unsafe, unethical or potentially harmful. If you have a question, need help or want to raise a concern, you have several options. Please refer to the decision tree on the next page for these options. If you make a report of a possible violation, although we encourage you to identify yourself, it is up to you whether to identify yourself or make an anonymous report. In some circumstances, it may be difficult for Ellucian to investigate or provide feedback on anonymous reports.

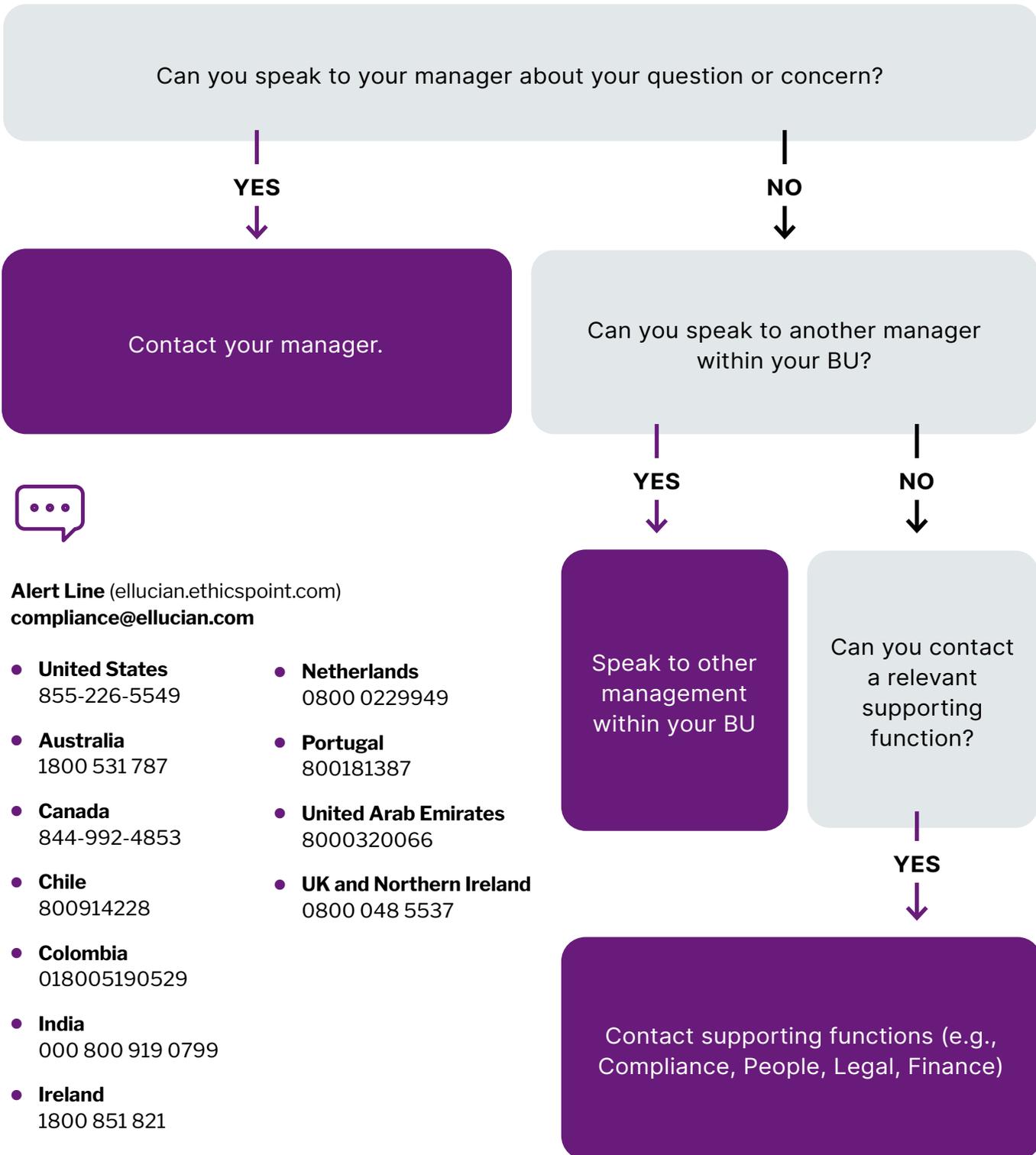
Zero Tolerance on Retaliation

Any employee who in good faith seeks advice, raises questions, or reports known or suspected misconduct is doing the right thing. Ellucian does not tolerate retaliation. We consider acts of retaliation to be misconduct. Retaliation can take many forms, for example: threats, intimidation, exclusion, humiliation, and raising issues maliciously or in bad faith. If you think that you or someone you know has experienced retaliation, contact any of the resources listed in the Code.

Ellucian Policies and Helpful Resources

- **Alert Line**
(ellucian.ethicspoint.com)
- **compliance@ellucian.com**
- **United States**
855-226-5549
- **Australia**
1800 531 787
- **Canada**
844-992-4853
- **Chile**
800914228
- **Colombia**
018005190529
- **India**
000 800 919 0799
- **Ireland**
1800 851 821
- **Mexico**
8006816909
- **Netherlands**
0800 0229949
- **Portugal**
800181387
- **United Arab Emirates**
8000320066
- **UK and Northern Ireland**
0800 048 5537

How do I report a concern?



Alert Line (ellucian.ethicspoint.com)
compliance@ellucian.com

- **United States**
855-226-5549
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- **United Arab Emirates**
8000320066
- **UK and Northern Ireland**
0800 048 5537

Our People

HUMANIZE. Our people are key to Ellucian's success. When we champion our differences to help create an equitable global community, we succeed individually and as a company. We all have a role in maintaining a culture based on respect and fairness.

Diversity and inclusion build teamwork and success

We value the unique contribution that each person brings to Ellucian. We accomplish more when people from diverse backgrounds and with different talents and ideas work together in an environment where everyone can contribute and make full use of their talents.

- Treat everyone with respect.
- Encourage and listen to those who speak up.
- Be respectful of cultural differences.

Equal opportunity is a matter of fairness, respect and dignity

We treat everyone with fairness, respect and dignity. We expect those we work with to act in a way that is consistent with our sense of fairness and equal opportunity.

- Base your work-related decisions on merit—not on race, color, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by applicable laws.
- The following behavior is never acceptable: offensive messages, derogatory remarks, inappropriate jokes, or conduct that aims to bully, victimize or belittle others.



Provide a workplace that is safe and free from harassment and intimidation

We do not tolerate any form of abuse or harassment or bullying. This includes actions that can reasonably be considered as offensive, intimidating or discriminatory, as well as any form of sexual harassment. Remember that harassment does not have to occur in the workplace or involve an Ellucian employee to violate our Code or the law.

- Help create a work environment free of all forms of harassment.
- Inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated.
- Reports of harassment, including sexual harassment or bullying, will be investigated promptly and thoroughly.
- If you are confronted with any form of discrimination or harassment or bullying, you are encouraged to let the person know that their behavior is unwelcome and ask that it be stopped immediately. You should also immediately report the incident to your manager, the People team, the **Chief Compliance Officer**, or the **Alert Line**. All managers who receive reports of such incidents must immediately notify the People team, or the **Chief Compliance Officer**.

Protecting Personal Information¹

Ellucian respects the privacy of its employees and will only take an interest in what employees do outside of work if it affects Ellucian's reputation or legitimate business interests.

Ellucian personnel often have access to personal information about customers and other third parties. This information should be protected according to Ellucian's privacy and security policies and standards.

There are many laws that apply to the protection of personal data in the various countries in which we operate. Some of these laws require us to provide a safe and consistent method for the cross-border transfer of personal data. We take great care to comply with all such laws in every applicable jurisdiction. Ellucian has implemented binding corporate rules (or "BCRs"), which govern the safe transfer of personal data between the various countries in which Ellucian and its customers operate.



¹ "Personal information" as used in this Code of Conduct means any information relating to an identified or identifiable natural person, and includes business contact information.

You also have a responsibility to comply with the BCRs whenever you transfer personal data (a) that we process when providing services to our customers or (b) about our employees, suppliers or customers.

For example, you must not send or access more personal data than is necessary for the intended purposes. It is important to store personal data in the correct system with appropriate access controls and consistent with our data retention policies. These principles will reduce the risk that data is unlawfully accessed or disclosed.

If you transfer personal data, please familiar yourself with both the **BCRs for Controller** and the **BCRs for Processor**.

We only use personal information when needed to operate effectively or comply with the law.

- All personal information should be protected and used only to the minimum extent necessary.
- If in doubt, consult **Compliance** or **Information Security**.

Ellucian Policies and Helpful Resources

- **Policy Portal**
- **EEO and Anti-Discrimination Policy**
- **Privacy Statement**
- **Information Security Policy**
- **Employee Data Privacy Policy**

Our Business Partners

We work with our business partners in an honest, respectful and responsible way. We are a company on which others can rely. Ellucian enables our customers to **GROW** through strong performance rather than through unethical or illegal business practices.²

Build and maintain strong relationships with suppliers and business partners

Our suppliers and business partners are essential to our ability to do business and meet our stakeholders' expectations. That is why we choose them carefully using an objective selection process. We seek to work with others who share our commitments to safety, ethics, and compliance.

- Communicate clearly our relevant expectations to our suppliers and business partners, agreeing to contractual obligations where applicable. Take the appropriate measures if they do not meet those expectations or obligations.
- Report any indications that a supplier or business partner is not complying with applicable laws or its contractual obligations.
- Make sure you know and follow the Ellucian third party-related requirements that apply to your business.

Exchange gifts and offer entertainment appropriately

We do not accept or provide gifts or entertainment in return for any business, services or confidential information, or if the intent is to bias a decision.

You, or those in your immediate family or household, may from time to time receive or give gifts or entertainment from business partners or competitors

of Ellucian. Although such gifts and entertainment may be intended to show friendship, appreciation or thanks, or otherwise create good will or enhance a business relationship, they can cross the line into bribery, which is illegal and which Ellucian strictly prohibits.

Ellucian has a detailed **Entertainment, Gifts, Gratuities and Charitable Contributions Policy** to help you avoid crossing that line. Entertainment is defined as a meal, conference, or sporting, cultural, or other event attended by the donor and the recipient. If both are not attending, it is considered a gift.

Below are the basic rules of the road for gifts and entertainment. As you read these rules, remember that lavish gifts and entertainment are likely to cause an apparent or actual conflict of interest. Consequently, in some circumstances gifts and entertainment are prohibited, and in other circumstances, you will at least need to obtain approval before giving or receiving these types of gifts or entertainment.

² This code refers to "business partner" companies. In general, a "business partner" is any person or company that is doing business with or seeking to do business with Ellucian. If you are not sure if a company is a business partner, please contact the **Chief Compliance Officer**.

Basic Rules for Gifts to or from, and Entertainment with, Government Officials³

YOU MAY NOT buy meals, give gifts, or offer anything of even nominal value to any government official, or accept any gifts or anything of even nominal value from a government official without first obtaining approval from the **General Counsel** or the **Chief Compliance Officer**.

YOU MAY attend a business meal or conference sponsored by a government entity or official, but only if approval is given in advance from the **General Counsel** or the **Chief Compliance Officer**.

Basic Rules for Gifts to or from Customers, Business Partners, or Third Parties

YOU MAY receive certain non-cash gifts (if you do not ask for them) from customers, business partners, or third parties and you may give certain non-cash gifts if they are reasonable and customary, proportionate to the circumstances, and have a bona fide business purpose. Always use your judgment to consider how a gift would appear to others.

YOU MAY NOT ask a customer, business partner, or third party for a gift, either directly or indirectly.

YOU MAY NOT accept or give cash gifts or the equivalent (e.g., gift cards) from/to a customer, business partner, or third partner (even if you have not asked for the gift).

YOU MAY NOT give or receive a single-instance, non-cash gift worth more than \$250 USD from/to any customer, business partner, or third party without approval from your manager and the **Chief Compliance Officer**. If either the donor or recipient is located in India, the limit is 250 INR. If either the donor or recipient is located in Mexico, the limit is 250 pesos. For all other regions, any gift with more than

a nominal value in the foreign jurisdiction/currency requires approval of your manager and the **Chief Compliance Officer**.

YOU MAY NOT give or receive non-cash gifts worth more than \$500 USD to or from a customer, business partner, or third party in a calendar year without approval from your manager and the **Chief Compliance Officer**. If either the donor or recipient is located in India, the limit is 500 INR. If either the donor or recipient is located in Mexico, the limit is 500 pesos. For all other regions, any gifts from a single source which have a greater than nominal value in the foreign jurisdiction/currency requires approval of your manager and the **Chief Compliance Officer**.



³ The term “government official” is defined broadly. It includes not just elected officials, but may also include employees of enterprises owned in whole or even in part by a government or in receipt of government grants; political parties and party officials; and candidates for political office and international public organizations. Certain enterprises may be owned or controlled by the government, which may make these agencies government officials within the meaning of the law.

Basic Rules for Entertainment with Customers, Business Partners, or Third Parties

YOU MAY provide or accept entertainment to/from customers, business partners, or third parties if the purpose of the event is business-related, you and the customer, business partner, or third party are attending the event, the value of the event is reasonable and customary and proportionate to the circumstances, it has a bona fide business purpose, and it is otherwise not unusually lavish or offered too frequently (so as to suggest some non-business purpose).

YOU MAY NOT accept payment for travel or hotel expenses from a business partner over \$250 USD (or \$500 USD⁴ in the aggregate from one customer, business partner, or third party in a calendar year) unless your manager and the **Chief Compliance Officer** have pre-approved the travel and hotel costs. If either the donor or recipient is located outside the United States, any travel or hotel expenses with a more than nominal value in the foreign jurisdiction/currency requires approval of your manager and the **Chief Compliance Officer**.



Be proactive and manage conflicts of interest

Employees and board members are expected to act in the best interests of Ellucian and avoid situations that create an actual or potential conflict of interest. A conflict of interest may occur when your personal or family interests or activities affect your ability to make sound, objective decisions for Ellucian. Even when nothing wrong is intended, just the appearance of a conflict can be harmful to Ellucian.

Be aware of the many different ways in which conflicts of interest can occur. For example:

- Holding outside jobs and affiliations with competitors, customers or suppliers.
- Working with close relatives, especially those who are government officials.
- Having an intimate relationship with another employee who can influence decisions such as salary, performance rating or promotion.
- Serving as a board member of another organization.
- Making or holding investments, including those of close relatives, which might influence or appear to influence your judgment.

Disclose situations to your manager or the **Chief Compliance Officer** that might create a conflict, or even the appearance of a conflict. Once disclosed, we then have the opportunity to better address the situation.



If there is a conflict between Ellucian's gifts and entertainment requirements and applicable external gifts and entertainment requirements, including local laws, follow the strictest requirement.

Some gifts and entertainment are never acceptable as they may be illegal or could damage our reputation. For example, anything that could be seen as a bribe or that is indecent or improper.

Obtain **Compliance** approval before paying travel expenses for government officials or agreeing to pay a per diem in connection with their travel.

Avoid Anti-Competitive Conduct

Any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply is prohibited. Contact **Compliance** with any questions.

Competition and antitrust laws are complex and often fact-specific. For this reason, if you have any questions, consult **Legal**.

Respect International Trade Laws

We abide by the trade laws of all countries in which we operate, including economic sanctions, import and export laws. Most countries in which Ellucian operates impose restrictions on the movement of products across borders.

- Trade sanctions, including financial sanctions, are complex. Employees are responsible for ensuring that transactions are appropriately cleared through Ellucian's screening processes. Contact **Legal** with any questions.
- Products intended for import or export, including equipment, software, and technology, must be classified in advance, and all required labeling, documentation, licenses and approvals completed. Contact **Legal** with any questions.

Ellucian Policies and Helpful Resources

- **Entertainment, Gifts, Gratuities and Charitable Contributions Policy**
- **Anti Bribery/Corruption and Prohibited Payments Policy**
- **Antitrust and Competition Policy**
- **Export Control and Economic Sanctions Compliance Policy**
- **Supplier Code of Conduct**
- **Partner Code of Conduct**
- **Restricted Party Screening**



The Government and Communities We Work With

We work together with governments and communities to **TRANSFORM** where we live and work by contributing to sustainable growth, creating jobs and investing in people.

Engage with communities and respect their rights and dignity

We want to be a trusted neighbor in the communities where we operate and live. Maintaining an open, ethical stance and respecting diversity, local cultures and customs makes a positive difference. We encourage participation in the local community.

- Notify your manager in advance of speaking with representatives of community organizations or non-governmental organizations (NGOs).

Commitment to Human Rights

We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as child labor, human trafficking and forced labor.

- Report any human rights abuse in our operations or in those of our business partners.

Stand Firm against Bribery and Corruption

We do not tolerate bribery or corruption in any of its forms in our business. We comply with anti-bribery and corruption laws and regulations and support efforts to eliminate bribery and corruption worldwide. We work to make sure that our business partners share our commitment.

- Do not offer or accept bribes, kickbacks or any other kind of improper payment, including facilitation payments.
- Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.
- Know who you are doing business with by completing appropriate due diligence, in accordance with the company's current practices.

Respect the Environment

Ellucian is committed to integrating environmentally conscious practices into its business activities. Ellucian accepts its environmental responsibilities and recognizes its obligation to limit the impact of business activities on the environment.

Public Communications and Protecting Ellucian's Reputation

It is essential that our public communications are clear, accurate, consistent and responsible.

- Remember that your social media posts and comments are not anonymous and can negatively affect Ellucian's reputation.
- Only authorized persons can talk to the media or members of the investment community. Contact **Marketing** if you are approached by the media.
- External presentations can be an excellent way to share our expertise with others, but make sure you have the required approvals before accepting any invitation and obtain the necessary approvals on content.

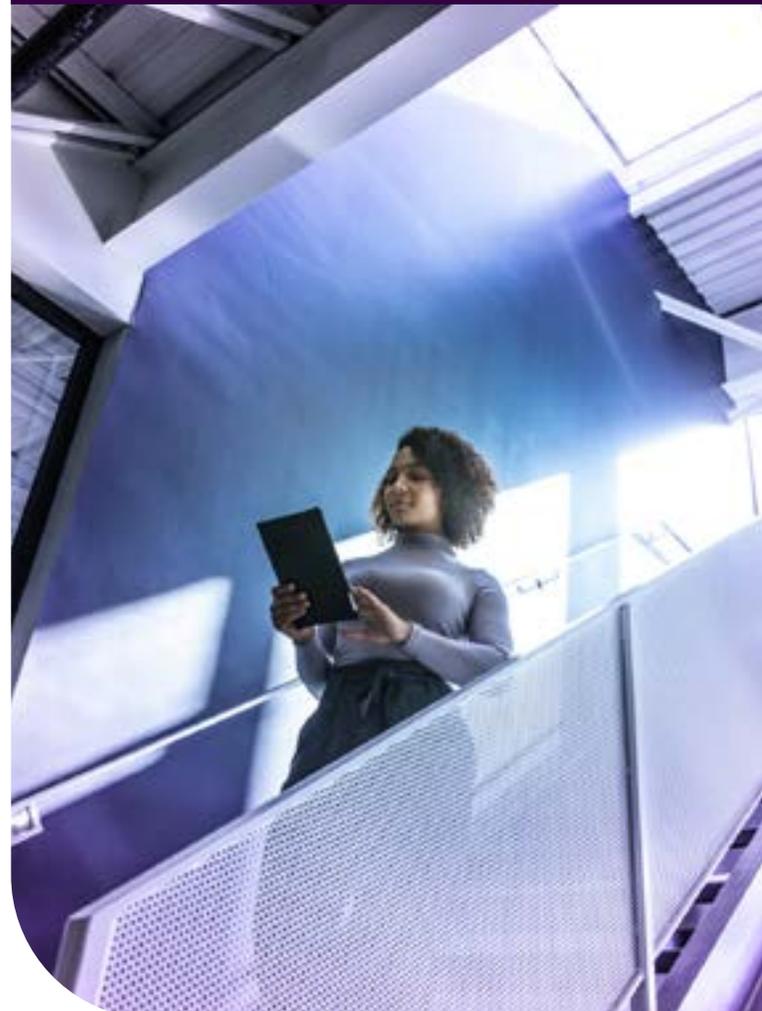
Our Stance on Political Activity

In accordance with applicable laws, Ellucian exercises its right and responsibility to make its position known on relevant issues. As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of Ellucian.

- Do not use company funds or resources to support any political candidate or party.
- Obtain business and **Legal** approval before engaging any government relations specialist or lobbyist.
- Personal political activities can sometimes create a conflict with Ellucian. Talk to your manager if you or a close relative are planning to accept or seek a public office, or if any other political activity might have an impact on Ellucian or on your job.

Ellucian Policies and Helpful Resources

- **Anti Bribery/Corruption and Prohibited Payments Policy**
- **Environmental Policy**
- **Social Media Policy**
- **Environmental, Social and Governance (ESG) Policy**



Our Assets and Financial Integrity

We have a responsibility to protect shareholder value, take care of our assets and resources, and be honest and transparent about our operations and performance.

Maintain accurate and complete information and records

All of us contribute to the process of recording financial and non-financial information. While protecting our interests, we must be open and honest about our business and performance. Business partners, government officials and the public rely on our accurate and complete disclosures and business records. Such information is also essential within Ellucian so that we can make good decisions.

- Ensure all transactions are properly authorized, recorded and reported, as required.
- Follow applicable laws and Ellucian policies when creating, maintaining, retaining or destroying documents including those in electronic formats.
- Make sure you have the necessary approvals from **Legal** before you respond to a request for information from a government or regulatory agency.

Ellucian Policies and Helpful Resources

- Sourcing and Signature Authority Policy
- Information Security Policy
- Legal Matters and Investigations Policy
- Records Management Policy



Protect Ellucian's Assets

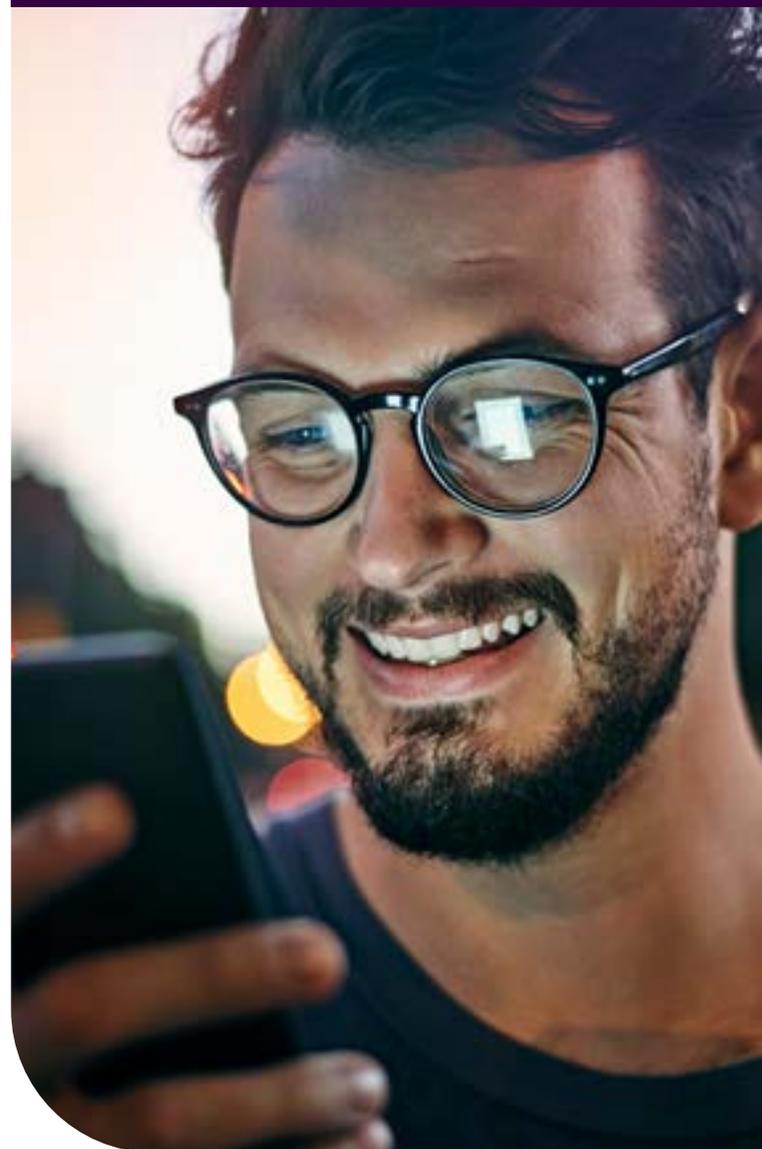
We are all responsible for protecting Ellucian's assets. Ellucian's assets include facilities, property and equipment, computers and IT systems, information, corporate opportunities and funds.

- Be conscientious and act appropriately to ensure company assets are not damaged, misused, or lost.
- Make sure your user IDs and passwords are secure.
- Computer equipment, phones, email and internet access are provided for business purposes and are monitored regularly to help Ellucian defend against cyber attacks and malicious activity. Limited personal use will usually be acceptable.
- Protect Ellucian information. When handling confidential and restricted information be especially careful by encrypting it when required in accordance with **Ellucian's Information Security Policy** and sharing it only with authorized parties. Unless authorized, do not share Ellucian information in public forums or on social media. For information about how to encrypt documents, **contact IT**.
- Be vigilant against cyber attacks and scams such as phishing. Report immediately any incidents, including potential or actual losses of Ellucian information or assets. For information on phishing, **contact IT**.

Guard our intellectual property and respect the intellectual property rights of others.

Ellucian Policies and Helpful Resources

- [Privacy Statement](#)
- [Information Security Policy](#)
- [Acceptable Use of Technology Policy](#)



Alert Line

One of your options for speaking up is the Alert Line. Alert Line, Ellucian’s global helpline, is a confidential way to get answers to your questions and to raise concerns. It is administered by an independent company, is available every day of the week at any time, day or night, and can accommodate calls in more than 150 languages.

Compliance Alert Line reports are handled by trained specialists employed by Navex Global, Inc., a third-party vendor, so you may remain anonymous if you wish. When you contact the Alert Line, you will be assigned a report number for future reference. If you wish to check the status of your report or provide additional information, you can contact Alert Line anonymously from most locations. Any report you make will be kept confidential to the fullest extent possible consistent with law and good business practices.

 You can also submit a report through the website at Ellucian.ethicspoint.com

 See decision tree on page 7 of this document.

 You can reach the Alert Line by calling:

- **United States**
855-226-5549
- **Australia**
1800 531 787
- **Canada**
844-992-4853
- **Chile**
800914228
- **Colombia**
018005190529
- **India**
000 800 919 0799
- **Ireland**
1800 851 821
- **Mexico**
8006816909
- **Netherlands**
0800 0229949
- **Portugal**
800181387
- **United Arab Emirates**
8000320066
- **UK and Northern Ireland**
0800 048 5537

Code of Conduct Annual Certification

I certify that I have access to and can obtain a copy of Ellucian’s Code of Conduct, which provides me with clear guidelines for my conduct as a representative of Ellucian and incorporates a code of ethics for all employees, officers, directors and other representatives of Ellucian. I understand that the Code of Conduct is available to me via the Ellucian intranet or from my People team representative.

I understand that I may report possible or suspected violations of the Code of Conduct by accessing the Alert Line online at **Ellucian.ethicspoint.com** or by calling one of the global numbers listed on the previous page, contacting the **Chief Compliance Officer** by phone or e-mail, sending an email to **compliance@ellucian.com**, or using any of the other reporting methods described in the Code of Conduct.

I certify that I have read the Code of Conduct and fully understand my obligation to comply with all of its terms. I understand that adherence to the Code of Conduct is a condition of my employment or engagement with Ellucian, and that failure to adhere to the Code of Conduct could result in very serious consequences to me and Ellucian. I understand that if I violate the Code of Conduct I will be subject to appropriate disciplinary and remedial sanctions, up to and including immediate discharge or termination of my engagement and possible legal action by Ellucian. I certify that I will fully comply with all terms of the Code of Conduct, and that, as of today’s date, I know of no violations of the Code of Conduct or the policies contained therein other than as reported. I understand that none of the benefits, policies, programs,

procedures or statements in the Code of Conduct is intended to confer any rights or privileges upon me or entitle me to be or remain an employee or other representative of Ellucian. I am aware that the Code of Conduct is not a contract and is subject to change at any time, without notice, at the sole discretion of Ellucian.

Disclaimer:

*No part of our Code of Conduct can be waived without prior approval. Waivers will only be granted in exceptional circumstances. All request for waivers shall be directed to **Compliance**. Our Code does not alter the terms and conditions of your employment. It details what is expected of everyone at Ellucian and supports us in being responsible and respectful. Failure to comply with our Code may result in disciplinary action up to and including termination. Any updates to this versions of the Code of Conduct will be made available on Ellucian’s intranet **policy portal**.*

PRINT NAME

SIGNATURE*

DATE

*When acknowledged online, no signature is required.