



# iCIMS Supplier Code of Conduct

2025



## Supplier Code of Conduct Commitment Letter

iCIMS' mission is to deliver world class talent acquisition technology that empowers organizations to build a diverse, qualified, and winning workforce of talented and dedicated individuals. Achieving our mission is driven by our commitment to providing our customers with the best experience for reliable and innovative hiring technology while staying true to our company values.

To accomplish this, we must have a high-caliber workforce that continuously holds itself to the highest standards, as required by the [iCIMS Code of Conduct](#). Our high standards apply not only to our employees, but extend to our suppliers, partners, vendors, consultants, and their employees (collectively, "Suppliers"). In your capacity as a Supplier, we expect you to implement management systems that facilitate compliance with laws applicable to your business, and to mitigate operational risks in alignment with iCIMS' Supplier Code of Conduct. This helps to ensure that our Suppliers adhere to evolving global business standards when providing goods and services to iCIMS.

We are proud of the work that we do at iCIMS, and we strive to continue to improve every day to best serve our incredible community of customers. Thank you for contributing to iCIMS' continued success in delivering our award-winning iCIMS software to our customers.

Sincerely,

Courtney Dutter

*General Counsel and Chief Compliance Officer*



## ICIMS MISSION AND VALUES

iCIMS is dedicated to providing our customers with the best experience for reliable and innovative talent acquisition software. To do this, every one of our Suppliers needs to understand and support our mission, purpose, and values by agreeing to our Supplier Code of Conduct.

### What we do? – Our Mission

iCIMS is the talent acquisition software company that empowers organizations to attract, engage, hire, and advance the right talent that builds a diverse, winning workforce. We deliver people driven transformation to move our customers' businesses forward because when you have the right talent join the right team, an organization wins.

### Why we do it? – Our Purpose

At iCIMS, we strive to passionately deliver world class hiring technology, empowering organizations to build the best teams and winning workforce that deliver transformative results.

### What drives us? – Our Values

At iCIMS, our culture is based on trust, respect, and inclusion. iCIMS encourages and trusts its employees to live its values every day.

## icims Values

<b>Personal Accountability</b>	to bring passion, drive, and ownership to your role, our business objectives, and your career development
<b>Customer Obsession</b>	no matter your role
<b>Trust</b>	that your colleagues have positive intent
<b>Transparency</b>	honest, respectful, constructive discussions about the business
<b>Flexibility</b>	there will always be change
<b>Inclusivity</b>	by respecting different backgrounds and opinions



## Commitment to Compliance

### Honest & Ethical Conduct

iCIMS promotes high standards of integrity by conducting business honestly and ethically. As an iCIMS Supplier, we expect the highest standard of ethics, integrity, and responsibility from your organization. Suppliers are required to be ethical in all aspects of their business.

### Legal Compliance

We require our Suppliers to comply with all laws, rules, and regulations applicable to Supplier, including any laws or regulations specified in Supplier's contract with iCIMS.

### Competition and Fair Dealing

iCIMS conducts business fairly and honestly in the marketplace, and as such, we expect our Suppliers to also conduct business in a fair and honest manner. We require our Suppliers to conduct their business in compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate.

### Conflicts of Interest

Suppliers must avoid activities that would create an actual or perceived conflict of interest regarding their duties, interests, and obligations to iCIMS. Suppliers must ensure that any conflicts of interest between the Supplier and iCIMS are addressed appropriately, and we expect that Supplier will promptly notify iCIMS at [compliance@icims.com](mailto:compliance@icims.com) if they become aware of any conflicts of interest with our company or have questions regarding any actual or perceived conflicts of interest.

### Anti-Bribery and Anti-Corruption

iCIMS has zero tolerance for any form of bribery, corruption, or kickbacks when our employees or Suppliers conduct business or establish relationships on behalf of iCIMS. Suppliers must never engage in any kind of bribery, corruption, or kickbacks to gain an unfair business advantage, including promising, offering, providing, or authorizing anything of value to government officials, political entities, or private entities in a commercial transaction anywhere in the world. Further, iCIMS expects that Suppliers will not offer or accept anything of value such as gifts, entertainment, or charitable donations from business partners to obtain an unfair business advantage. iCIMS expects Suppliers to comply with all applicable anti-corruption and anti-bribery laws, including but not limited to the UK Bribery Act and U.S. Foreign Corruption Practices Act (FCPA).



### Gifts, Entertainment, and Charitable Donations

Suppliers may not offer or accept anything of value from business partners to obtain unfair business advantages. Any gifts, entertainment, or charitable donations must comply with applicable laws and regulations and must not violate ICIMS's policies on the matter. "Gifts, entertainment, or charitable donations" includes anything of value, such as loans, prizes, meals, tickets, gift certificates, charitable giving, or donations of time for an event.

### Trade Controls and Sanctions

Our Suppliers must comply with all applicable trade laws and regulations, especially those involving export or import. As a company with international offices and customers, we work with suppliers that also operate globally. As such, iCIMS prohibits its Suppliers from (1) being located in a country, territory, or jurisdiction that is subject to European Union (EU), United States (US), United Kingdom (UK), Canada, or other national embargoes or significant trade restrictions, (2) being subject to any EU, US, UK, Canada, or other applicable jurisdiction's sanction, debarment, or prohibited or restricted parties lists, and (3) providing technologies, products, or technological information in violation of these laws, regulations, and requirements.

### Data Protection & Privacy

iCIMS recognizes that maintaining the privacy and security of the data we process is critical and, as a result, we maintain privacy and security policies and processes that meet or exceed current industry standards and best practices. Suppliers are required to comply with all data protection and privacy laws and regulations applicable to the data processed by Supplier when providing products and services to iCIMS, as set forth in the applicable agreement(s) with iCIMS. Suppliers are required to provide appropriate data protection and privacy training to all personnel having access to the iCIMS data processed by Supplier or to other iCIMS information or resources utilized during the business relationship.

### Protection of Information and Resources

iCIMS utilizes software and other iCIMS internal resources to complete required day-to-day business. Suppliers may need access to these resources, as well as confidential or sensitive information, when providing products and services to iCIMS. To ensure these resources are protected and this information remains confidential. Suppliers must implement safeguards designed to protect against accidental or unlawful destruction, loss, alteration, or unauthorized disclosure of or access to this information. Suppliers must comply with all applicable data protection and privacy laws, including but not limited to local, state, national, and/or foreign laws, treaties, and/or regulations. Suppliers must only use information or resources that have



been legitimately acquired and licensed, and Suppliers will not inappropriately or unlawfully use iCIMS information or resources. Suppliers must comply with all iCIMS requirements, policies, and processes when utilizing iCIMS' information or resources during the business relationship.

### Intellectual Property

Suppliers must respect iCIMS' intellectual property rights and adhere to the requirements set forth in the agreement(s) between iCIMS and the Supplier, where applicable. Suppliers are required to make all reasonable efforts and take necessary precautions to maintain confidentiality and protect the intellectual property rights of iCIMS' information. Wherever agreements between iCIMS and Supplier may provide for rights to use iCIMS' logos, trademarks, service marks, tradenames, or other intellectual property, iCIMS requires and Supplier agrees to comply with iCIMS branding guidelines in all cases to preserve and protect iCIMS' rights in its marks. iCIMS further requires and Supplier agrees to respect any request from iCIMS to remove or redact the use of iCIMS' marks in any marketing or promotional materials and ensure that any such materials do not imply an endorsement of Supplier's goods or services without iCIMS' express prior written consent in each instance.

### Accuracy of Business Records

Our Suppliers must maintain accurate books and records in accordance with legal requirements, contractual obligations, and best practices that adhere to ethical standards that align with iCIMS' values. Our Suppliers must also be able to provide business records related to iCIMS upon written request, without falsification or misrepresentation, to all appropriate parties and as required by law.

### Disclosure and Supplier Documentation

iCIMS works with Suppliers that conduct business appropriately and ethically. To ensure iCIMS understands the Supplier's business and products or services being provided, iCIMS may request information on the Supplier's business activities and structure, financial situation, legal disputes or regulatory investigations, hiring practices, oversight of third parties, information on products and services provided, data privacy and security measures, accessibility, or other areas addressed in this Supplier Code. Suppliers must work with iCIMS on the requested business-related information and provide documentation as needed.

### Questions, Reporting Concerns, and Whistleblowing

iCIMS strives to be an ethical corporate citizen, and iCIMS' employees, customers, and Suppliers are expected and encouraged to report to iCIMS any suspected unlawful activity,



misconduct, or other violation of any law or iCIMS policy so that management can investigate and, if necessary, correct the alleged unlawful activity. Suppliers are also encouraged to maintain a reporting mechanism for the Supplier's employees, customers, and vendors to report any questions or concerns to the Supplier. To report a question or concern to iCIMS, our Suppliers may contact iCIMS by sending an email to the iCIMS Compliance Department ([compliance@icims.com](mailto:compliance@icims.com)), iCIMS General Counsel's Office ([generalcounsel@icims.com](mailto:generalcounsel@icims.com)), or submitting a report through the [iCIMS Integrity Helpline](#).



## Commitment to Supplier's Team

### Compliance with Employment Laws

Suppliers are required to follow all general workplace standards and must comply with all applicable laws and regulations, including those that relate to labor, wages, benefits, background checks, working hours, discriminatory hiring, and employment practices. This commitment establishes and ensures a safe working environment for all Supplier employees.

### Employment Choice and Protecting Employee Rights

Supplier will not use or permit any form of forced, bonded, indentured or child labor. All work must be voluntary, and all workers must be free to terminate their employment at any time. Supplier will respect employees' rights to freely associate and bargain collectively in accordance with all applicable laws and regulations. iCIMS expects all Suppliers ensure that all work is performed on a voluntary basis and does not violate any fundamental human rights or applicable laws or regulations.

### Occupational Health and Safety Practices

Suppliers must comply with all applicable health and safety laws and regulations and are expected to provide their employees with a healthy and safe workplace, including access to clean, safe and reasonable working conditions. Supplier also must create and maintain procedures to prevent, manage, track and report employee safety incidents with appropriate corrective action.

### Discrimination and Harassment

iCIMS is an equal opportunity employer and provides reasonable accommodations to applicants and employees with disabilities. iCIMS strictly prohibits discrimination and harassment of any kind based on race, color, religion, national origin or ancestry, sex (including pregnancy), sexual orientation, gender identity or expression, age, veteran status, marital status, medical condition, mental or physical disability, or any other characteristic protected under applicable law, and we expect our Suppliers to abide by these requirements as well. Suppliers must comply with all applicable employment laws.

### Dedication to Equality and Inclusion

iCIMS is committed to fostering a culture of inclusion where every iCIMS employee understands their role, how their ethical conduct and impact leads to iCIMS success, and each employee feels empowered to share their ideas and opinions. As such, iCIMS seeks to do business with Suppliers who value and respect all of their employees.





### Employee Training

iCIMS is dedicated to ensuring our employees are provided with the right tools and knowledge to successfully do their jobs. Training is one of the ways employees learn and understand their obligations and requirements. iCIMS requires our Suppliers to ensure they provide their employees with training outlining expectations on data protection, information security, ethical business conduct, prevention of discrimination and harassment, and other topics included in this Supplier Code. iCIMS expects all Suppliers ensure these trainings and other required courses are completed by the supplier's employees on an annual cadence.

### Freedom of Association and Collective Bargaining

iCIMS respects and will not interfere with our employees' lawful right of free association and collective bargaining, and we expect our Suppliers to adhere to applicable laws and to recognize, respect and protect the rights of their employees without fear of retaliation.



## Commitment to Supplier's Communities

### Environmental Impact and Sustainability

iCIMS recognizes it is our responsibility to conduct our business in a way that encourages sustainability and is environmentally conscious. iCIMS encourages its Suppliers to align with this mission and continuously improve their approach to sustainability and reducing their environmental footprint. Likewise, all Suppliers are required to comply with all applicable environmental laws and regulations.

### Air Emissions and Minimizing Carbon Footprint

iCIMS encourages all Suppliers to identify, manage, and reduce their carbon emissions as much as possible.

### Pollution Prevention

iCIMS encourages all Suppliers to identify, manage, and prevent all forms of pollution to ensure they are conducting their business in an environmentally sustainable manner.

### Community Outreach and Charitable Giving

iCIMS is dedicated to supporting local communities. As such, iCIMS encourages all Suppliers to align with iCIMS and participate in community outreach and charitable giving so long as it does not violate applicable laws and regulations.

### Protecting Human Rights and Mitigating Risks of Modern Slavery

iCIMS is committed to mitigating risks of slavery, servitude, forced or compulsory labor, human trafficking, and child labor ("Modern Slavery") in order to comply with applicable laws and the commitments in the [iCIMS Modern Slavery Statement](#). As such, we expect our Suppliers to have similar commitments and ensure all work is performed on a voluntary basis and does not violate fundamental human rights. Suppliers should review their suppliers and their own supply chains to ensure they are free of Modern Slavery in accordance with applicable laws.