

## LINCOLN EDUCATIONAL SERVICES CORPORATION

### Human Rights Policy

Lincoln Educational Services Corporation (the “Company”) is committed to promoting high standards of honest and ethical business conduct and compliance with applicable laws, rules and regulations. This is reflected in many of the Company’s existing policies including our Code of Conduct. In furtherance of this commitment, the Company has adopted this Human Rights Policy (this “Policy”) setting forth our commitment to respecting the fundamental rights to which everyone is entitled consistent with the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.

#### Scope and Commitment

This Policy applies to all directors, officers, employees and students. At Lincoln, we are committed to high ethical standards in the conduct of our business and encourage those with whom we do business, such as our vendors and business partners, to do the same. We strive to create and maintain a safe environment in which everyone is treated with dignity and respect and to operate in compliance with all applicable laws wherever we conduct business. This includes our commitment to protection against discrimination and harassment based on race, religion, color, national origin, sex, age, marital status, disability, military or veteran status and other legally protected categories or characteristics, protection against child labor, forced labor and human trafficking, among other things. We endeavor to understand our impact on human rights in the conduct of our business across our corporate offices and campuses.

#### Human Rights Values

At Lincoln, we view our people as our most valuable asset and support policies and practices that will create a positive employment environment for our employees and a positive educational environment for our students. Such policies and practices include the following:

- **Anti-Discrimination and Employment Opportunities.** Equal and non-discriminatory treatment for all persons, employees and students alike, is a paramount principle. Equal employment opportunities are offered to all employees without consideration as to race, religion, color, national origin, sex, age, marital status, disability, military or veteran status and other legally protected categories or characteristics.
- **Working Conditions.** We endeavor that our workplaces are safe and free from threats of violence, intimidation, bullying, harassment, degrading treatment and discrimination and that all persons are treated with dignity and respect.
- **Child Labor and Forced Labor.** We strive to uphold the highest level of ethics and responsibility with respect to opposition of child and forced labor.
- **Fair Wages/Compensation.** We are committed to compensating our employees fairly at market comparable wages and benefits that comply with applicable employment and labor laws.
- **Training and Development.** As our people are our most valuable asset, training and development of our employees with a view to promotion is a principle focus as it fosters business continuity and long-term successful conduct of our business.

- Privacy. In our technologically advanced world the generation, retention and dissemination of information safely has become challenging. Safeguarding the privacy and property of all individuals, including with respect to the personal data that comes into our possession, is essential to us. We are committed to the collection, utilization and storage of data in compliance with all applicable laws and Company policies.

Lincoln offers training and engagement on human rights to its employees and encourages employees to be familiar with this Policy. Questions or concerns regarding this Policy and any non-compliance may be reported to the Company's Human Resources Department.

This Policy is a further statement of the fundamental guiding principles to which Lincoln subscribes and will be periodically reviewed and updated as deemed necessary or appropriate.