
Guidehouse®
OUR CODE OF CONDUCT
Charting the right course
outwit complexity™

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Setting our ethical compass



A note from leadership

As Guidehouse continues to grow and evolve, our success is directly tied to our reputation and to the trust people place in our brand.

Every day, each one of us plays a critical role in making good decisions and ethical choices that shape our culture, build trust, reflect our RI^{2}SE values, and enable our clients to achieve more.

And all of us share in this responsibility for stewarding our brand and protecting it.

We can never take this for granted. As Guidehouse colleagues, we are all entrusted to make decisions that impact our reputation as well as our relationships with one another, our customers, and the communities we serve. Our Code of Conduct ("Code") is our ethical compass—a set of guiding principles designed to ensure that our actions are aligned with our values and serve as a resource for guiding the right decisions and the right behaviors.

Please take the time to study and apply our Code to your daily activities as we work together to build this next-generation professional services firm with an exceptional culture we can all be proud of.

For when we lead with integrity and live up to our values, there's nothing we can't achieve together."

– Scott McIntyre, Guidehouse CEO



Message from Ethics & Compliance

> Guidehouse is a company founded in integrity, trust, honesty, and ethical behavior. We expect our colleagues to conduct business according to the highest ethical standards and to comply with all applicable laws.

Our Code applies to all of us and provides us with the guardrails, guidance, and confidence we need to make the right choices—no matter the situation, our role, or geography.

In this complex business environment, it is up to every one of us to thoroughly understand and apply our Code through our daily work. The Code is not meant to address every situation you might encounter. If you need any clarification or additional guidance, please reach out to our Ethics & Compliance office using one of the many avenues provided.

Thank you for your partnership in these principles and commitment to always doing the right thing, living our values, and stewarding our brand forward."

– Shamir Patel, Chief Ethics & Compliance Officer

RI²SE values

Respect > Be a beacon

WE RISE BY illuminating the value each person brings, ensuring all can shine.

Integrity > Be the compass

WE RISE BY being courageously ethical and charting the right course.

Innovation > Ignite change

WE RISE BY combining deep expertise with boundless creativity, delivering outstanding results.

Stewardship > Be a guardian

WE RISE BY helping our people grow, our business succeed, and communities thrive.

Excellence > Pursue perfection

WE RISE BY being committed, refusing average, and constantly evolving.



Our Code as our guide

The foundation of our Code is our values, which are core to our culture and establish our standards of ethical behavior. Our Code provides an overview of the laws, regulations, and company policies that apply to us and the work we do, and where to go for help when the answer isn't clear. While it will not cover every situation, the Code serves as a valuable guide for all employees and Board members to help make decisions that reflect our values and ensure our continued success and reputation.

Many of the policies covered in our Code are accompanied by fully standalone policies that provide additional direction and details. All policies are accessible to our employees on our company intranet.

Administering the Code of Conduct

Guidehouse's Ethics & Compliance team is responsible for administering the Code. Any requests for modification or exception to the Code must be submitted to and approved by the Chief Ethics & Compliance Officer. All employees are required to acknowledge that they have read the Code and agree to uphold it.



Who's covered?

GUIDEHOUSE

Our Code applies equally to all employees at Guidehouse regardless of level, seniority, business segment, or location. The Code applies to Guidehouse Inc. and to all direct and indirect wholly-owned subsidiaries.

VENDOR CODE OF CONDUCT

We want to work with organizations who share similar values and a commitment to conducting business ethically. Our Vendor Code of Conduct ("Vendor Code") is based on the same values and principles as our Code. As a condition of working with Guidehouse, all vendors must comply with the Vendor Code.

GUIDE 101 What if our code conflicts with local law?

Guidehouse operates globally, and at times there may be local customs or practices that conflict with our Code. In cases like these, consult with the Office of General Counsel (OGC).

Additional responsibilities for leaders

Set the tone. In addition to the policies and standards that apply to all employees, managers have important leadership responsibilities for demonstrating their personal commitments to this Code by fostering a workplace that demonstrates our values. Talk about ethics and compliance issues with your teams to show that you think they're important and help them stay top-of-mind.

Cultivate a speak-up culture. We expect our managers to create an open-door environment where employees feel comfortable asking questions or raising concerns. Be aware of available reporting channels so that you can properly guide employees when necessary.

Handle concerns with care. The majority of concerns that ultimately are raised to Ethics & Compliance are first reported to a manager. As a result, it's imperative that managers properly handle reports they receive and escalate issues to HR and/or Ethics & Compliance as appropriate.

Some workplace issues, such as disagreements among team members or other day-to-day concerns, are often best addressed by the manager, sometimes in conjunction with HR. For allegations of suspected illegal or unethical conduct, the issue must be reported by the manager through one of the reporting channels. Never investigate an allegation of suspected misconduct yourself. Manager resources to provide guidance on handling complaints are available on the Ethics & Compliance page on the intranet.

Violations

Guidehouse takes all violations of the Code and its underlying policies seriously. Any employee who is found to have violated the Code, or who has failed to report a known Code violation by another employee, is subject to disciplinary action commensurate with the nature and severity of the violation, up to and including termination of employment.

Ethical decision-making

Even with the Code as your guide, there will inevitably be times when you're faced with a situation where the right path is not clear. In these situations, always use good judgment and know when to consult with someone and ask for help.

GUIDE 101 Set the right ethical tone.

As a manager, your team is listening closely to what you say, including comments such as:

"It doesn't matter how you get it done, just get it done."

"We cannot miss our hours target again this month."

"Let's not make this a bigger deal than it has to be. We can keep it between us."

These comments may be misunderstood by team members as a request to do something unethical.

Remove ambiguity and routinely talk to your teams about how ethics comes first above business targets.

Decision-making guidance

Is it the right thing to do?

Would your friends, family, and community approve?

Would you be proud if this ended up in the media?

Does it protect our goals and interests?

Does it reflect our values and culture?

Does it comply with our policies?

Is it legal?

If you answered "no" or you're not sure, it's a good indication that you should stop and seek guidance before taking any action.

Anchoring in honesty and transparency

Speak up

Ask a question or raise a concern

In alignment with our RI²SE values, Guidehouse wants to address concerns and issues, and course-correct when something isn't right. To have the opportunity to do that, we need to know about the issues.

All employees have the obligation to speak up when something doesn't feel right, or they suspect or observe behavior that violates the Code, another corporate policy, or a law or regulation. We know this can be hard to do. We have many resources available to you to report a concern, and you can choose the resource that you're most comfortable with in a given situation.

You can raise a question or concern to your manager, another leader, HR, or an Ethics & Compliance representative.

You can also submit a report via the ethics hotline. In the U.S. and in other geographies as permitted by law, the ethics hotline allows you to submit a question or concern anonymously. Operated by an independent third party, the ethics hotline offers anonymous reporting capabilities as well as phone and web reporting options.

We investigate reports of misconduct thoroughly and handle all matters confidentially, discussing them only with others who have a need to know.





GUIDE 101 I have a suspicion that an employee may have violated the Code, but I don't have proof. Should I report it?

Even if you aren't certain a violation occurred, you should report the concern. An investigation will be conducted to determine if a policy violation occurred.

GUIDE 101 I raised a concern about discrimination via the ethics hotline. What happens next?

Your case will be assigned to a Guidehouse Ethics & Compliance team member for investigation. The Ethics & Compliance team member will maintain confidentiality and share details of your concern to only those with a need to know who are assisting in the investigation. You may be interviewed or asked for follow-up information to assist in the investigation. You'll also be provided with feedback before the case is closed, though we may not be able to provide details of any actions taken for confidentiality reasons.

Good faith reporting

While you don't have to have proof or be certain that a violation has occurred to report it, we do require that the report be made in good faith. This means that at the time of the report, you honestly believe the concern to be true. All employees must comply with our "Complying with Audits and Investigations Policy," which also requires cooperation with internal investigations.

Non-retaliation policy

We prohibit any form of retaliation against anyone who reports a potential violation of our Code, company policy, or applicable law, or participates or assists in the investigation of the same.

Reporting concerns externally

While Guidehouse offers multiple channels to encourage open dialogue internally, you are also free to participate in an investigation or raise concerns to a federal, state, or local agency or commission, as well as to any self-regulatory authority.

In addition, employees performing on U.S. Department of Defense (DoD) programs may contact the DoD Inspector General Hotline at www.dodig.mil/hotline to report issues related to fraud, waste, abuse, and mismanagement under the purview of DoD.

Non-employees can also use our ethics hotline if there is a concern related to Guidehouse.



We maintain a respectful and safe work environment

We are an organization not of one culture, but many cultures. That's why our approach is built on more than simple numbers.

It's built on the belief that awareness, collaboration, and an open exchange of ideas spark new ways of thinking that drive innovation for all. And it's rooted in our RI²SE values to empower our professionals with the growth opportunities it takes to develop into leaders.

Equal opportunity

We bring together employees with a wide variety of backgrounds, skills, and cultures. Dedicated to sustaining a respectful culture, we value different ideas, perspectives, and experiences. All employees are expected to do their part to support this commitment by treating everyone with respect and dignity and valuing each other's ideas.

We are committed to providing equal opportunity in employment for all applicants and employees regardless of race, color, national origin, ancestry, citizenship status, military status, protected veteran status, religion, creed, physical or mental disability, medical condition, marital status, age, sex, sexual orientation, gender, gender identity, genetic information or carrier status, or any other characteristic protected by law.

All employment-related decisions must be based on merit and a careful evaluation of an applicant's or employee's skills and performance, and in alignment with our RI²SE values.

Promoting a respectful, harassment-free work environment

Guidehouse is committed to providing a respectful work environment free from harassment, including sexual harassment, and discrimination. Such conduct may be physical, verbal, or visual.

Employees are required to speak up if they see or suspect discrimination or harassment based on any protected characteristic. Please see our "Non-Discrimination and Anti-Harassment Policy"' for more information.

Respect for human rights

Guidehouse is committed to respecting and upholding the human rights of our employees and those we interact with, directly or indirectly. We will guard against complicity in human rights abuses, comply with applicable labor and employment laws, and draw on internationally recognized labor principles governing how we do business. For more information, please see our global human rights statement at www.guidehouse.com.

GUIDE 101 We work with a vendor who routinely makes offensive jokes about religion to a coworker. What should I do?

If you're comfortable doing so, speak to the vendor and ask them to stop. If you prefer, you can also report the matter to your HR business manager, your manager, or the ethics hotline.

If you or someone else is in immediate danger, call 911 or your local law enforcement, and then once safe to do so, alert Guidehouse Security (and your local building security, if applicable).

Workplace safety

Guidehouse is committed to providing a healthy, safe work environment. To that end, we must comply fully with all health and safety laws, rules, and regulations for the jurisdictions in which we operate. This requires the involvement and commitment of all our employees, who have a duty of care both to themselves and others to maintain a safe work environment and follow safe working practices.

Violent acts, direct and indirect threats, and words, gestures, or symbols that promote violence are not tolerated. Workplace violence prevention applies to company or client property, locations for company business, and company-sponsored events. Please report any violence or suspected violence immediately to Security, HR, or Ethics & Compliance.

In accordance with local laws, Guidehouse prohibits the possession of a firearm while on company property or at a client's premises.

Emergency response and business continuity

We use a comprehensive 24/7 emergency notification service for two-way employee communication by phone, email, or text during a large-scale IT system outage or other crisis. People serving in health and safety management roles (which include first responders and fire marshals) are responsible for investigating and reporting on accidents and incidents. Each year we review our "Health and Safety Policy," which is included in our employee handbooks and onboarding sessions, and tailor it to local office and country needs.

Drugs & alcohol

Substance abuse that impacts the workplace may jeopardize the safety of others. All Guidehouse employees are prohibited from using, selling, purchasing, or possessing illegal drugs when on company premises or while engaged in company business. While there may be instances where drinking alcoholic beverages while conducting company business is permitted, all employees must do so in compliance with our "Drug & Alcohol Policy" and ensure that such use doesn't contravene otherwise applicable laws or client rules. Employees who choose to drink alcohol at company-sponsored events or while representing the company are required to do so responsibly and exhibit professional behavior at all times.

Guiding a path of integrity

GUIDE 101 Personal conflicts of interest examples:

Relationships: Making a decision to hire a family member or close friend or engaging in a relationship with someone you supervise

Financial: Providing advice to a client on vendor selection when you hold material investments in one of the companies

Outside business activities: Working part-time for a client or competitor without Guidehouse company approval

Procurement: Selecting or recommending a supplier where your family member is employed

Please see the "Personal Conflicts of Interest Policy" for more information.

How Guidehouse conducts business

Our commitment to deliver excellence in a competitive business environment presents challenges that we must meet with integrity.

In all our business conduct we must adhere to both the letter and spirit of all applicable laws, regulations, and company policies.

Avoiding conflicts of interest

Part of conducting business with integrity means that we maintain our ability to provide objective, unbiased business advice to our clients, and that we make decisions in the best interest of Guidehouse.

Conflicts of interest can arise both from personal relationships and interests (personal conflicts of interest) and through corporate-level activities (organizational conflicts of interest).

Outside business activities are one potential source of personal conflicts of interest. Examples of outside business activities are any secondary employment, directorship, or board position that is independent of the employee's Guidehouse role. Pre-approval from Ethics & Compliance is required, with some very limited exceptions,



before beginning any outside business activities (current employees) or continuing any outside business activities post-hire (new employees). Please refer to the "Outside Business Activities Policy" for more information.

For employees, this means that:

1. You are required to understand potential sources of conflicts of interest and take action where possible to avoid the conflict—or even the perception of a conflict.
2. You must disclose all required conflicts of interest according to the relevant policies. Often Ethics & Compliance can help mitigate or resolve the situation.

Corporate opportunities & clients

Guidehouse personnel are prohibited from:

- Personally taking for themselves opportunities that properly belong to Guidehouse or are discovered using corporate property, information, or position
- Using corporate property, information, or position for personal gain
- Competing with Guidehouse during the period of their employment

Organizational conflicts of interest (OCI) can occur where the company has improper access to procurement-sensitive information, has helped the client develop procurement requirements, or has an incentive based on other business relationships to provide biased advice.

For employees, this means that:

1. If you're notified that you're subject to an OCI mitigation plan, you must abide by the restrictions therein.
2. You must report any concerns regarding OCIs to the Office of General Counsel or your engagement partner.

Insider trading

Because we act as trusted business advisors to our clients, sometimes we become aware of non-public information that may be of significance to investors or potential investors, such as merger and acquisition plans, financial reports, or other significant corporate events. It is illegal to trade securities based on inside information or to advise others to do so based on information that you have obtained.

DO consult with our Legal Department if you're unsure whether information you learned is subject to our "Insider Trading Policy."

DON'T share any nonpublic information learned in your Guidehouse role with anyone else. Sharing such information for someone else to trade on is called "tipping" and is also illegal.

GUIDE 101 I'd like to start offering training services to clients, and some of the material that I've developed as part of my Guidehouse work would be useful. Because I worked on it, can I use this for my side business?

No. Any work product that was developed for Guidehouse or its clients is proprietary and is corporate property. As such, it may not be used for personal gain.

Self-reporting of suspension & debarment

As a government contractor, Guidehouse makes certain certifications and has reporting obligations related to the suspension or debarment status of the company and our personnel. All Guidehouse personnel must notify the Office of General Counsel or Ethics & Compliance if they are notified of being subject to a potential suspension or debarment.

Accurate recordkeeping

Accurate recordkeeping is an everyday part of every employee's job. Whether it's the accuracy of a client invoice, an employee timesheet, or expenses, all financial records must be maintained accurately to preserve the integrity of our financial systems. Records may also be non-financial, such as employee resumes that we include in proposals or certifications that we complete for clients or vendors. Regardless of whether the record is financial or non-financial, always be honest and complete in the records you are responsible for.

What this means for you:

- Always record your time based on the hours you work, and apply your time to the appropriate project codes corresponding to the work performed.
- Carefully review client or supplier invoices to ensure that they accurately reflect the work performed or delivered.
- Comply with our expense policies and use our corporate credit card for business expenses only.
- Always be honest and accurate when you report or record information about Guidehouse.
- If you notice an error, advise the client or supplier as soon as possible and work with the appropriate team to promptly correct the error through credits, refunds, or other mutually acceptable means.

GUIDE 101 My supervisor told my team we are under budget for the month on our project. Is it ok to add extra hours to my timesheet this month if I plan to work them next month?

No. Doing this would be falsifying your timesheet and would violate our Code and Time Reporting Policy, which requires that you record time based on actual hours worked, and not based on budget or any other factors.

Sailing the waters of fair competition

GUIDE 101 Be alert for and report any red flags that may suggest a potential violation of anti-trust laws or regulations such as:

Competitors asking for our pricing information on a bid, or for information on our business strategies and plans

Requests to raise or fix prices on an opportunity in conjunction with a competitor

Requests to "come to an agreement" to not bid on a certain opportunity

Requests to share supplier bid information, such as a technical approach or pricing

Bribery and corrupt activities

Focused on upholding the highest standards of honesty, we stand firm on our zero tolerance policy for corruption across the business.

Fair competition & anti-trust

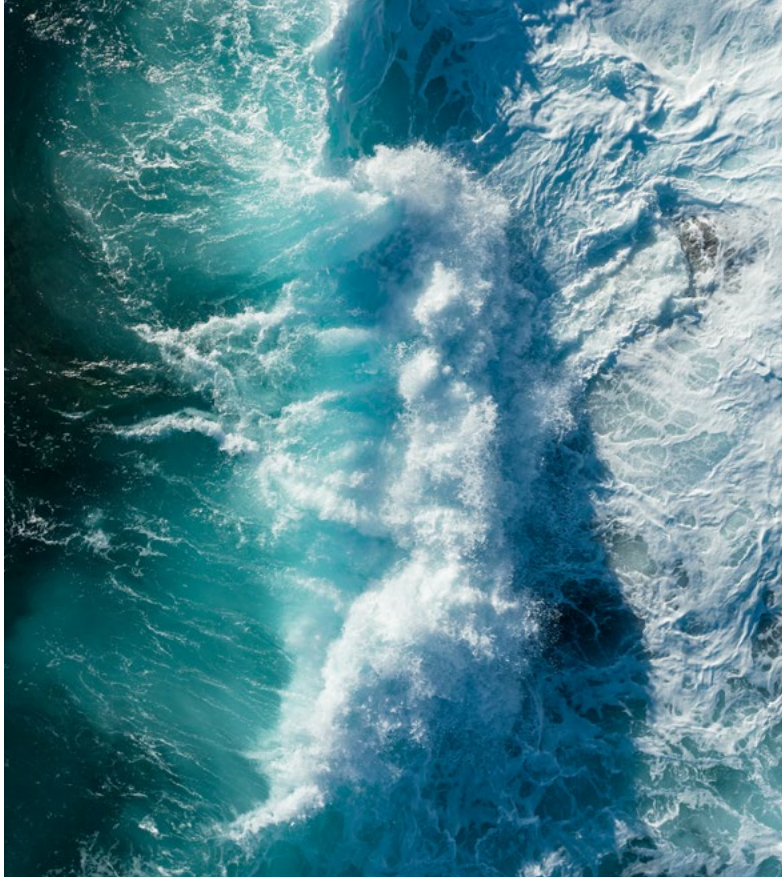
We promote our services through fair and accurate competitive comparisons. We exercise sound judgment and integrity, drawing the line between fair and unfair competitive practices. When gathering competitive data, we collect information from publicly available sources, and we do not exchange sensitive information such as pricing policies or salary data with competitors.

Fair dealing

All Guidehouse personnel must endeavor to deal fairly and in good faith with our clients, suppliers, competitors, shareholders, and employees. No employee shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any other unfair dealing practices.

Anti-corruption

Trust and integrity are the foundation of our company, and we firmly believe our success is based on the quality of the



services we provide. We have zero tolerance for bribery and any other forms of corruption and require compliance with all applicable anti-bribery and anti-corruption laws.

A bribe is anything of value that's offered or requested directly or indirectly to obtain an unfair advantage or to improperly influence a public official or private sector entity's or individual's actions.

The Foreign Corrupt Practices Act (FCPA), The UK Bribery Act, and similar laws of many other countries where Guidehouse operates, make corruption illegal. However, our zero-tolerance policy for bribery is also deeply rooted in our values, as we understand the significant negative impact that corruption has worldwide, including by impeding economic development and human rights.

All employees must report any concerns about corrupt activity to Ethics & Compliance, irrespective of what local law may permit, or whether the law of a particular country distinguishes between bribery of a government official or a commercial party. Our "Anti-Corruption Policy" applies companywide and prohibits bribery in all situations. The same applies to third parties acting on our behalf.

Our policy also prohibits facilitation payments, or small payments made to a government official under the guise of speeding up official action like a business registration or other administrative action.

Gifts and entertainment

The exchange of modest gifts or entertainment with business partners can establish trust and strengthen important relationships. However, we must distinguish between activities that help build business relationships and activities that are—or appear to be—excessive, inappropriate, or even illegal. Our "Gift & Entertainment Policy" establishes the criteria under which the exchange of gifts and entertainment may be permitted.

U.S. federal, state, local, and foreign laws generally prohibit us from providing or accepting gifts, entertainment, or other items of value, to or from a government official or employee.

Before offering or receiving anything of value to or from a government official or employee (or a relative of such government official or employee or other organization or individual because of their association with such government official or employee), Guidehouse personnel must obtain approval from Ethics & Compliance.

Do your part

- Ensure that any gifts or entertainment you offer or accept comply with our "Gift & Entertainment Policy." Obtain required approvals where necessary in advance of accepting or offering the gift.
- Do not offer anything of value to government officials without consulting in advance with Ethics & Compliance.
- Government officials in many cases are not permitted to accept gifts from government contractors like Guidehouse.
- Be mindful that our business partners have their own policies on accepting gifts. Never offer anything that would put the business partner in an uncomfortable position by violating their policies.

Anti-money laundering

Money laundering is the movement of cash or other assets generated from illegal activities through legitimate financial institutions or businesses to conceal the source of the funds or make the source of the funds appear legitimate. As these funds can come from or support criminal activity, human trafficking, drug trafficking, or terrorism, we take our responsibility to help do our part to combat money laundering seriously through established due diligence, standard payment terms and procedures, and other controls. All Guidehouse employees are required to do their part by remaining vigilant in identifying red flags and escalating them for investigation.

GUIDE 101 Be alert for anti-money laundering red flags, including:

Alerts identified in our due diligence process

Customers or suppliers who provide incomplete information or are reluctant to provide requested information about the organization

Requests to circumvent normal payment procedures

Requests to transfer payments to different entities or locations

Lobbying

Guidehouse personnel who engage in lobbying activities on behalf of the company to influence legislative, regulatory, or policy issues, including efforts to obtain contracts for the company, must obtain pre-approval from Ethics & Compliance. Guidehouse may be required to register personnel engaging in these types of activities as lobbyists under U.S. federal, state, and local laws.

Political activities

We encourage our personnel to be involved in the political process by supporting the candidates and parties of their choice—on their own time, and with their own funds and resources. However, as a contractor to federal, state, and local governments, we can't make campaign contributions using company funds or use company resources to support candidates or political parties.

Due to certain state and local legal requirements, there may be some restrictions and/or disclosure obligations related to personal political contributions. Therefore, we require that partners, Guidehouse board members, their spouses or domestic partners, and their dependent children contact Ethics & Compliance to request pre-clearance before making any contributions to current state or local officials (even if running for a federal position) or to someone running for a state or local position or committee.



Navigating compliance and legal requirements

GUIDE 101 Remember that even a request to comply with a boycott may trigger reporting requirements for our company under U.S. anti-boycott regulations.

Be alert to boycott requests that may be hidden in contracts or tenders, and seek guidance from your OGC attorney as necessary.

Trade compliance and environmental stewardship

As a multi-national organization operating globally, Guidehouse and its employees must be careful to comply with all applicable international trade laws and regulations and be responsible environmental stewards.



Please see our "Sanctions & Anti-Boycott Policy" and "Export & Import Compliance Policy," which are available on the intranet.

Export & import compliance

We will comply with regulations administered by various government agencies (including the U.S. Department of Commerce and Department of State) related to the export of certain goods, services, technology, or related "export-controlled information" from the U.S. Employees who may handle export-controlled information during their Guidehouse work, such as those supporting U.S. federal government clients, must be vigilant in ensuring compliance with any export restrictions prior to transmitting documents or technical information outside of the U.S.

Complying with sanctions & anti-boycott laws

Guidehouse will not conduct business with countries or parties subject to restricted or excluded status by the U.S. government. We have established rigorous due diligence procedures and related internal controls for business partners to assess whether we are able and comfortable with doing business with a third party. All employees must follow our established due diligence procedures. Consult with Ethics & Compliance if you have any questions about our ability to do business in a specific country or with a particular person or entity.

Guidehouse will not comply with any boycott requests that are not sanctioned by the U.S. government and will report any requests to participate in such boycotts to the appropriate U.S. government agency.

Employees must support our commitment to anti-boycott compliance by identifying boycott-related requests and reporting them through our established reporting channels. If you receive a boycott-related request, whether orally or in a transaction document such as a contract or a request for proposal, you should not respond to the request in any way and should immediately contact Ethics & Compliance.

Environmental stewardship

We work with our clients, governments, and other entities toward long-term environmental sustainability. We also take actions internally to reduce our operational impacts on the environment.

We annually measure and report on our environmental performance in line with global frameworks, standards, and platforms such as CDP (the Carbon Disclosure Project), GHG Protocol, Global Reporting Initiative, and EcoVadis. As our company evolves, so do our efforts to establish standards and set environmental targets.

ENERGY & EMISSIONS

Guidehouse considers environmental risks, energy efficiency, and other sustainability factors when selecting office locations (in building spaces that we don't own). We purchase environmental attribute certificates to cover an increasing share of our global electricity demand. Our global travel agency provides emission data for our business travels, including flights, rail transport, rental cars, and hotel stays (accommodation).

CLIENTS

We lead our clients through the challenging, evolving topic of environmental sustainability through our offerings and by encouraging them to act on leading initiatives. As a thought leader and innovator, we contribute to the global conversation on related issues and work with important environmental organizations.

NATURAL RESOURCES

We recycle and reuse according to local waste management guidelines. We strive for all offices to have separate recycling and waste bins, train employees in recycling and reuse, and encourage employees to reduce waste through sustainable procurement. Guidehouse uses a certified external party for the management and disposal of our IT assets in most of our offices. In several of our offices, we have drinking water machines that calculate and display the number of bottles saved. We also have water bottle fillers and water machines in break rooms in several offices for water bottle refills.

SUPPLY CHAIN

Our environmental impact extends beyond our operational footprint. Many of our suppliers, particularly large multi-national corporations, already provide disclosures aligned with frameworks such as CDP, GHG Protocol, and the European Union's Corporate Sustainability Reporting Directive. We use this existing data to assess supplier performance. For suppliers who don't publicly disclose emissions data but contribute significantly to our Scope 3 footprint, we are building and refining our supplier engagement strategy.

Plotting the course for data privacy and security



Do you know who's listening?

Remember to be vigilant about discussing non-public information in places like elevators, airports, restaurants, or other public spaces. Your conversations may be overheard by interested parties, and you may inadvertently disclose client or company information to unauthorized parties.

Information & assets

In today's interconnected digital landscape, ensuring robust data security is of paramount importance.

Protecting information

Unless authorized by clients or required by law, and in all cases only as permitted by law, regulation, contract, or other agreement, we don't disclose Guidehouse's or our clients' private business affairs outside the company. Nor do we share confidential company or client information with Guidehouse personnel or others who don't have a legitimate business need to know. We're also cautious when discussing confidential matters in public spaces. If you're not sure whether information can be shared, please consult with your supervisor or the Legal Department.

Your responsibility to protect information extends to before and after your employment with Guidehouse. Never share non-public information from a former employer with anyone at Guidehouse. After your departure from Guidehouse, your obligation to continue to protect our non-public information continues.

When collecting, transferring, and otherwise handling information entrusted to Guidehouse, we must always follow the company's information security procedures and use secure, approved technologies.

Using business assets responsibly

Guidehouse business assets—which, interpreted broadly, can include anything our company owns—must be protected from theft, damage, and misuse. Examples of business assets that may be entrusted to employees include technology, intellectual property, badges, and office space. While limited personal use may be permitted under our policy, all business assets are entrusted to employees for business purposes only. Any personal use must be minimal and must not otherwise violate our information security policies or the law.

Intellectual property

We must protect Guidehouse's intellectual property (IP) and the IP of others. We respect and comply with copyright, trademark, and similar laws, and we use such protected information in compliance with applicable legal standards.

Guidehouse IP is a business asset, and preserving the integrity of our IP helps maintain our competitive business advantage. Your responsibility and obligation to protect IP continues even after you depart Guidehouse.

Privacy

Guidehouse is committed to protecting client and personal data—and under certain circumstances is required to do so. Toward this end, all employees must secure data in compliance with our policies developed to meet security requirements and all applicable rules and regulations. When dealing with personal data, employees must only collect and use the minimum amount of personal data needed. We will only use personal data for the purposes described in our privacy policies and notices. We are committed to compliance with all applicable privacy laws.

Responsible use of AI

The use of AI for generating content such as text, images, code, audio, video, and data is expanding rapidly. We must ensure that AI is used responsibly and in accordance with all applicable laws.

For example, we must ensure that humans oversee and direct AI and review AI outputs as appropriate. AI must be used in ways that promote fairness among different individuals and groups, and we should guard against uses of AI that result in biases or discrimination against individuals or groups. Also, responsible use must avoid risking physical or other types of individual injury, exposing the company or its clients to reputational or legal risks, or creating privacy risks for individuals in connection with the use of AI. Finally, we must be transparent about AI uses and be prepared to explain in human terms how AI is used in making decisions or generating output.

The Guidehouse principles for responsible use of AI are:

Responsible use and accountability. AI is used responsibly and lawfully in support of company goals. We identify and address potential risks in advance, including by seeking input from stakeholders who may be affected by AI. Humans oversee and direct AI and review AI outputs—including to ensure that outputs are valid and reliable—before any significant decisions are made.

Fairness and avoiding bias. AI is used in ways that promote fairness among different individuals and groups. Affirmatively guard against using AI in ways that lead to bias or discrimination based on race, color, national origin, ancestry, citizenship status, military status, protected veteran status, religion, creed, physical or mental disability, medical condition, marital status, age, sex, sexual orientation, gender, gender identity, genetic information or carrier status, or any other characteristic protected by law.

Safety and security. Deploy AI in ways that avoid risking physical or other types of individual injury or exposing the company or its clients to reputational or legal risks. Implement AI in ways that account for potential security risks, including testing for potential vulnerabilities and implementing appropriate security controls.

Privacy. Incorporate privacy protections into AI use. If personal information is collected and used in AI models, reasonably limit and control such uses, consistent with individuals' expectations and relevant data privacy laws.

Transparency and explainability. Be transparent about when AI is being used and allow opportunities for feedback. Be prepared to explain how AI is used in making decisions or generating output and any limitations on its capabilities that may impact such decisions or output.



Do not input data that constitutes confidential client or Guidehouse information into a large language model (LLM) unless the LLM and supporting services are approved for controlled data and registered in the EDSP (Engagement Data Security Plan).

The reasoning here is that the LLM provider may retain prompt data for use in subsequent training. This disclosure and potential external storage/use of controlled data may breach contractual obligations or laws that protect such information.

Preserving trust

Protecting the Guidehouse reputation

We each play a vital role in preserving the organization's standing through responsible and considerate conduct.

Communicating responsibly

To preserve and strengthen the Guidehouse reputation and brand, it's important that all employees recognize their responsibilities to communicate clearly and in line with our values. To ensure that we're communicating clearly and consistently with stakeholders, only employees who are authorized to speak on behalf of Guidehouse may respond to media inquiries or speak on Guidehouse's behalf. If you're contacted by any external entity, such as the news media, and they're requesting statements on behalf of our company, such inquiries must be referred to our Corporate Marketing team.

We all have important responsibilities to preserve our reputation when using social media as well. Never post confidential information, such as that of a client, business partner, or internal Guidehouse information, on social media. Remember that sometimes even the name of a client may be confidential.



When expressing personal views on social media, always exercise good judgment, recognizing that your clients and colleagues may view your posts. Where possible, make clear that any opinions expressed are your own and not those of Guidehouse. Social media posts that violate our policies, such as our "Social Media Policy" or "Anti-Harassment & Discrimination Policy," may result in disciplinary action.

Questions & concerns

For questions on the Code, contact the Ethics & Compliance team at ethics@guidehouse.com.

GUIDE 101 Be aware of social media sensitivity

Remember that for some sensitive engagements, disclosing even the name of a client on social media may be sharing confidential information and may be in violation of our contract terms with a client. If you are unsure whether you are able to post the name of a client, please contact your leader or Ethics & Compliance.

Guidehouse
outwit complexity™

As the stewards of Guidehouse's ethos, we hold the key to upholding its principles and forging a legacy of ethics and excellence.

It's up to us.

You are responsible for creating and maintaining a professional atmosphere in which every individual is valued and treated with dignity and respect. Our standards of behavior in our Code and its underlying policies are expected both inside and outside the workplace, whether in a company or client office, working from home, or anytime you are otherwise representing Guidehouse.

This includes company social events and interaction with work colleagues or work-related third parties. Failure to comply with this policy is subject to corrective action up to and including termination of employment.

Preserving our good reputation is in your hands. Maintaining the trust of our clients and business partners is inextricably linked to our ability to fulfill our mission statement to solve important problems as well as to our continued success.

Irrespective of your role at Guidehouse, you are a representative of the company.

As we embark together on a journey guided by our shared principles, let us remember that our individual actions collectively shape the identity of our house. Upholding this Code is a testament to our commitment to excellence, integrity, and mutual respect. Thank you for your dedication to nurturing a thriving and just workplace.

Helpful links:

Ethics & Compliance Ethics Hotline
Human Resources Business Partners
Legal
Policies

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