

Charting the Right Course

OUR CODE OF CONDUCT

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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 the trust people place in our brand.

Every day, each one of us play a critical role in making good decisions and ethical choices that shape our culture, build trust, reflect our RIISE 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 and relationships with one another, our customers and the communities we serve. Our Code of Conduct is our ethical compass, a set of guiding principles to ensure that our actions are aligned with our values and a resource for guiding the right decisions and the right behaviors.

Please take the time to study and apply our Code of Conduct to your daily activities as we work together to build the 'next generation consultancy' and 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

Setting our Ethical Compass

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 of Conduct 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 each and 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 and 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 and Compliance Officer

RI²SE Values

Respect > Be a Beacon

WE RISE BY illuminating the diversity 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.

Setting our Ethical Compass

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 of Conduct. In cases like these, consult with the office of general counsel.

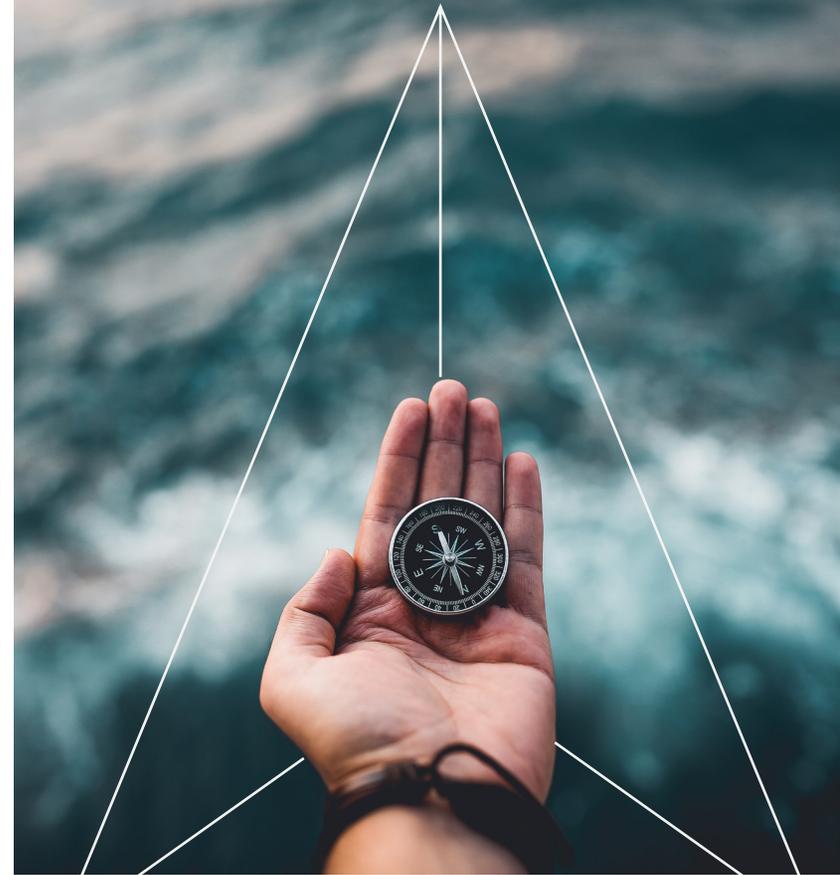
Our Code as Your Guide

The foundation of our Code of Conduct is our values. Our values 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, it 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 full standalone policies that provide additional direction and details. All policies are accessible to our employees on our Company Intranet, the Hub.

ADMINISTERING THE CODE OF CONDUCT

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



WHO IS COVERED?

Guidehouse

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

Vendor Code of Conduct

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

Setting our Ethical Compass

Why Words Matter:

As a manager, your team is listening closely to what you say. Comments like:

“It doesn’t matter how you get it done, just get it done.”

“We can’t 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.

ADDITIONAL RESPONSIBILITIES FOR LEADERS

Set the Tone

In addition to the policies and standards that apply to all employees, managers have important leadership responsibilities and are responsible for demonstrating their personal commitments to this Code by fostering a workplace that demonstrates our values. Talk about Ethics & Compliance with your teams- it shows that you think it is important and stays 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.

VIOLATIONS

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

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 is 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 Hub.

ETHICAL DECISION MAKING

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

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 is a good
indication that you should
stop and seek guidance
before taking any action.

Anchoring in Honesty and Transparency

I have a suspicion an employee may have violated the Code but do not have proof. Should I report it?

Yes! 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.

Speak Up

Ask a Question or Raise a Concern

In alignment with our RIISE Values and Mission, Guidehouse wants to address concerns and issues and course correct when something isn't right. In order 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 you 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 are most comfortable with in a given situation.

You can raise a question or concern to your Manager or another leader, a Human Resources Representative, or Ethics & Compliance.

You can also submit a report via the Ethics Hotline. In the United States and in other geographies as permitted by law, the Ethics Hotline allows you to submit a question or concern anonymously. The Ethics Hotline is operated by an independent third party in order to afford the anonymous reporting capability and offers phone and web reporting options.



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



Report Received



Investigation Conducted



Findings & Corrective Actions Taken

Anchoring in Honesty and Transparency

I raised a concern about discrimination via the Ethics Hotline. What happens next?

Your case will be assigned to a Guidehouse E&C team member for investigation. The E&C 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 will be provided feedback prior to case closure, though we may not be able to provide details of any actions taken for confidentiality reasons.

GOOD FAITH REPORTING

While you do not have to have proof or be certain a violation occurred to report it, we do require the report is made in good faith. This means that at the time of the report, you honestly believe the concern to be true. All employees are required to 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 of Conduct, 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 any self-regulatory authority.

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

Our Ethics Hotline can also be used by non-employees if there is a concern related to Guidehouse.



Internal Reporting Options



Visit the website to submit your concern by web or find the phone number for your local area.

Anchoring in Honesty and Transparency

GUIDE 101 

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

If you are comfortable doing so, speak to the vendor and ask them to stop. If you prefer, you can also report the matter to your HRBP, your manager, or the Ethics Hotline.

We Maintain a Respectful, Inclusive, and Safe Work Environment

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

It's built on a 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.

DIVERSITY, EQUAL OPPORTUNITY, & INCLUSION

We bring together employees with a wide variety of backgrounds, skills, and cultures. We value different ideas, perspectives, experiences, and are committed to sustaining a culture of inclusion and diversity. 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 or employee's skills and performance, and in alignment with our Corporate 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 the Non-Discrimination & 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. Guidehouse 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.

Anchoring in Honesty and Transparency

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 and 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 Guidehouse 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, words, gestures, or symbols that promote violence are not tolerated. Workplace violence prevention applies to company or client property, locations for company business, or company sponsored events. Please report any violence or suspected violence immediately to Security, Human Capital, 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.

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 on 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 such use does not 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 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 and 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, except for some very limited exceptions, prior to 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. Disclose all required conflicts of interest according to the relevant policies. Often Ethics & Compliance will be able to help mitigate or resolve the situation.

Guiding a Path of Integrity

I'd like to start offering training services to clients and some of the material I have 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.

CORPORATE OPPORTUNITIES & CLIENTS

Guidehouse personnel are prohibited from (a) personally taking for themselves opportunities that properly belong to Guidehouse or are discovered through the use of corporate property, information, or position; (b) using corporate property, information, or position for personal gain; and (c) 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 assisted the client in developing procurement requirements, or has an incentive based on other business relationships to provide biased advice.

For employees, this means that:

1. If you are notified you are subject to an OCI mitigation plan, you must abide by the restrictions therein.
2. Report any concerns regarding OCIs to the Legal Department or your engagement partner.

INSIDER TRADING

As we are often acting as trusted business advisors to our clients, there may be times where we are made aware of non-public information that may be of significance to an investor or potential investor, 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 the legal department if you are unsure whether information you learned is subject to our Insider Trading policy.

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

Guiding a Path of Integrity

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 factor.

SELF-REPORTING OF SUSPENSION & DEBARMENT

As a government contractor, the company 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 the General Counsel or Ethics & Compliance if they are notified of being subject to a potential suspension or debarment.

ACCURATE RECORD KEEPING

Accurate record keeping is an everyday part of every employee's job. Whether it is 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 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 to the appropriate project codes corresponding to the work performed.
- Carefully review client or supplier invoices to ensure 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.

Sailing the Waters of Fair Competition

Be alert! Watch out for and report any red flags that may suggest a potential violation of anti-trust laws or regulations.

Competitors asking for our pricing information on a bid, or 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.

Bribery and Corrupt Activities

We are focused on upholding the highest standards of honesty, and 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 do not exchange sensitive information with competitors, such as pricing policies or salary data.

FAIR DEALING

All Guidehouse personnel must endeavor to deal fairly and in good faith with the Company’s 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 is 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 world-wide, including by impeding economic development and human rights.

Sailing the Waters of Fair Competition

Be Alert for Anti-Money Laundering Red Flags

- 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.

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 company-wide 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.

Federal, state, local, and foreign laws generally prohibit us from providing and 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 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.
- Don't 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 business so as 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 do our part to combat money laundering seriously, and have 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.

Sailing the Waters of Fair Competition

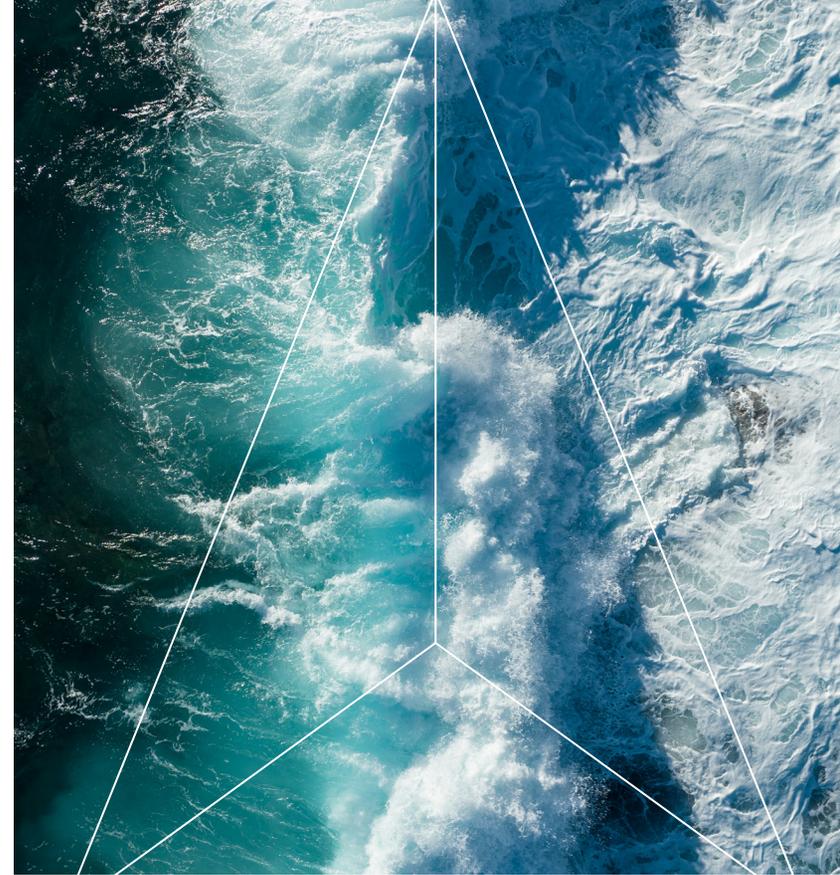
LOBBYING

Guidehouse personnel that 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. The company may be required to register personnel engaging in these types of activities as lobbyists under federal, state and local laws.

POLITICAL ACTIVITIES

The company encourages our personnel to be involved in the political process—to support candidates and parties of their choice, on their own time, with their own funds and resources. However, as a contractor to federal, state, and local governments, we cannot 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, the company requires that before any partner, or Guidehouse Board member, their spouse/domestic partner or dependent children make a contribution to a current state or local official (even if running for a federal position) or someone running for a state or local position or committee, you must contact Ethics & Compliance to pre-clear contributions.



Navigating Compliance and Legal Requirements


GUIDE 101

Remember that even a request to comply with a boycott may trigger reporting requirements for the Company under US 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 compliance, and be responsible environmental stewards.

Please see our Sanctions & Anti-Boycott and Export & Import Compliance Policies available on the Hub for our complete policies.

EXPORT & IMPORT COMPLIANCE

We will comply with regulations administered by various government agencies (including the Department of Commerce and the Department of State) related to the export of certain goods, services, technology or related “export-controlled information” from the US. Employees who may handle export controlled information in the course of their Guidehouse work, for example employees supporting US Federal Government Clients, must be vigilant that they are complying with any export restrictions prior to transmitting documents or technical information outside of the US.



COMPLYING WITH SANCTIONS & ANTI-BOYCOTT LAWS

Guidehouse will not conduct business with countries or parties subject to restricted or excluded status by the US government. The Company has 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 the company’s ability to do business in a country or with a person or entity.

Guidehouse will not comply with any boycott requests which are not sanctioned by the US Government and will report any requests to participate in such boycotts to the appropriate US Government agency.

Navigating Compliance and Legal Requirements

Employees must support the Company's 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 (RFP), you should not respond to the request in any way, and should immediately contact Ethics & Compliance

ENVIRONMENTAL STEWARDSHIP

We are committed to being responsible stewards of the environment and are actively working with our clients, governments, and other entities to promote solutions toward long-term environmental sustainability- while also taking actions internally to reduce our operational impacts on the planet.

To learn more about our environmental stewardship efforts, please see our Environmental Sustainability Report available on our website.

Energy & Emissions

We are committed to pursuing activities that lower our climate impact. Currently, we do this by monitoring our comprehensive GHG footprint yearly in line with climate science. In addition, we have committed to offsetting the impact of our global office-based electricity use with 100% renewable energy. Guidehouse encourages sustainable alternatives, such as telecommuting and reducing nonessential travel, which lessen our carbon emissions.

Clients

Guidehouse leads our clients through the challenging, evolving topic of environmental sustainability through our offerings and by encouraging them to act on leading initiatives. We contribute to the global conversation by serving as a thought leader and innovator as well as partnering with important environmental organizations.

Natural Resources

Guidehouse responsibly manages our use of natural resources. We reuse and recycle according to local waste management guidelines, ensure all offices have separate recycling and waste bins, train employees on usage of recycling and waste bins, and encourage employees to reduce waste through sustainable procurement.

Supply Chain

Guidehouse recognizes that our environmental impact is broader than just our operational footprint, which is why we incorporate environmental criteria into the selection of our suppliers. We also evaluate new real estate options based on select environmental criteria and strive to move toward more sustainable choices. Guidehouse will strive to minimize the impact of our most significant supply chain emissions categories through efforts such as sustainable purchasing guidelines.

Plotting the Course for Data Privacy and Security



GUIDE 101

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 do not disclose the company'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 do not have a legitimate business need to know. We are also cautious when discussing confidential matters in public spaces. If you are 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, misuse. Examples of business assets which 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. 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 and the intellectual property of others. Respect and comply with copyright, trademark and similar laws, and use such protected information in compliance with applicable legal standards. Guidehouse's Intellectual Property is a business asset and preserving the integrity of our IP helps maintain our competitive business advantage. Your responsibility and obligation to continue to protect IP continues even after you depart Guidehouse.

PRIVACY

Guidehouse is committed, and under certain circumstances required, to protect client and personal data. To 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.

Plotting the Course for Data Privacy and Security

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.

RESPONSIBLE USE OF AI

The use of artificial intelligence to generate content such as text, images, code, audio, video and data (“AI”) 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 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:

- 1. Responsible use and accountability.** Ensure that AI is used responsibly and lawfully to support the goals of the Company. Identify and address potential risks in advance, including by seeking input from stakeholders who may be affected by AI. Ensure that humans oversee and direct AI and review AI outputs—including to ensure that outputs are valid and reliable—before any significant decisions are made.
- 2. Fairness and avoiding bias.** Ensure that 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 on the basis 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.
- 3. 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.
- 4. Privacy.** Incorporate privacy protections into use of AI. 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.
- 5. 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.

Preserving Trust

Protecting the Guidehouse Reputation

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



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 about whether you are able to post the name of a client, please contact your Engagement Leader or Ethics & Compliance.

COMMUNICATING RESPONSIBLY

To preserve and strengthen the Guidehouse reputation and brand, it is important that all Guidehouse employees recognize their responsibilities to communicate clearly and in line with our Values.

To ensure we are 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 are contacted by any external entity, such as the media, and they are requesting statements on behalf of the 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 GH policies, such as the Social Media Policy or our Anti-Harassment & Discrimination Policies, may result in disciplinary action.

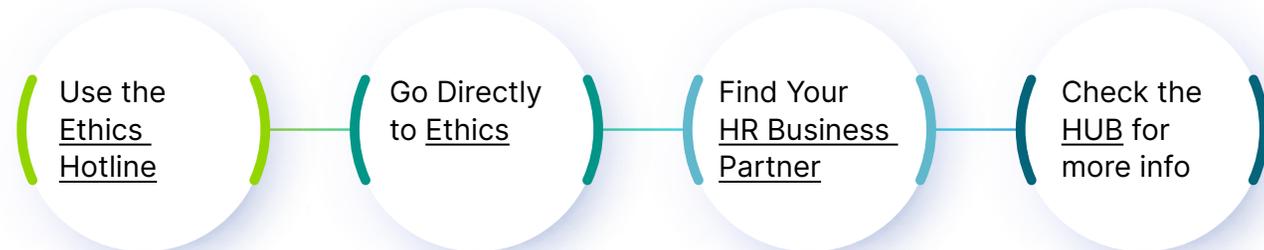
Questions & Concerns

Contact

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



Internal Reporting Options



Visit the website to submit your concern by web or find the phone number for your local area.

Thank
You

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 of Conduct 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 and 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 of Conduct 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 HUB Links:

[Ethics & Compliance](#)

[Ethics Hotline](#)

[Human Resources Business Partners](#)

[Culture & DEI Resources](#)

[Legal](#)

[Policies](#)

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