At Guidehouse, our values of **Integrity**, **Excellence**, **Innovation**, and **Teamwork** are the core to our culture and establish our standards of expected ethical behavior. We take pride in working with suppliers that hold themselves accountable to the same ethical and compliance standards.

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**Guidehouse Supplier Code of Conduct**

Compliance with Laws

Our suppliers will comply with all applicable laws of the US and the countries in which it does business and adhere to this Code. If an activity is legal in a local jurisdiction but is in violation of this Code, the supplier will meet the standards of this Code.

Accurate Record Keeping

Our suppliers will create and maintain accurate records, including time and expense reports. All records, regardless of format, made or received as evidence of a business transaction will fully and accurately represent the transaction or event being documented. No record may be altered to conceal or misrepresent the underlying transaction being represented. When a record is no longer needed to conduct current business, records should be retained based on the applicable retention requirements.

Human Rights

Our suppliers will respect and uphold the human rights of all people by guarding against human rights abuses. Guidehouse prohibits suppliers from encouraging or engaging in human trafficking or child labor, and expects that all suppliers will adhere to regulations prohibiting human trafficking.

- Suppliers will not destroy, conceal, confiscate, or otherwise deny employees’ access to identity or immigration documentation; charge recruitment fees; use recruiting firms that fail to meet local labor laws; provide housing that fails to meet local safety or housing laws; fail to provide necessary employment documents in a language the employee understands.
Employment Practices
Our suppliers will provide a safe work environment, free from harassment or discrimination, by:

- ensuring their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct
- providing equal employment opportunity to employees and applicants for employment

Anti-Corruption
Guidehouse does not tolerate bribery or any form of corruption. Our suppliers will comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business.

We require our suppliers to refrain from offering or making any improper payments of money or anything of value to Guidehouse employees, public officials, suppliers, their agents or other third parties. This prohibition applies even in locations where such activity may not violate local law.

Our suppliers will exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.

Anti-Trust & Fair Competition
Our suppliers will not fix prices or rig bids, or engage in any other form of anti-competitive behavior with their competitors. They will not exchange current, recent, or future pricing information with competitors.

Gifts and Entertainment
Our suppliers will ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation and that it is not excessive, inappropriate, or intended to influence decisions that should be based solely on business considerations.

Insider Trading
Our suppliers will not use non-public information obtained in the course of their business relationship with us as the basis for trading or for enabling others to trade in the securities of any company.

Conflict of Interest
Our suppliers will avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with our company. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

Information Protection
Where Guidehouse shares information with suppliers as part of the business relationship, our suppliers will properly handle all sensitive information, including confidential, proprietary, and personal information.

We expect our suppliers to respect and comply with copyright, trademark, and similar laws, and use such protected information in compliance with applicable legal standards.

Trade Compliance
Our suppliers will conduct business in accordance with applicable laws, directives, and regulations related to import and exports, sanctions, and anti-boycott regulations.

Ethics Program Expectations
Commensurate with the size and nature of their business, our suppliers will have a program in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct.

Our suppliers will provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation and where applicable provide notice of government whistleblower rights.

We encourage suppliers to report ethical concerns through the appropriate channels at their respective employers or to Guidehouse’s Ethics Hotline at 833-770-0009 or at http://www.lighthouse-services.com/guidehouse. Guidehouse is committed to protecting individuals against retaliation. The Guidehouse Ethics Hotline allows for anonymous reporting and all reports will be taken seriously and handled by the Guidehouse Ethics Office to ensure appropriate corrective actions are taken.

Consequences for Violating Code
In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing contract.