

Charting the Right Course

VENDOR CODE OF CONDUCT

Vendor Code of Conduct

At Guidehouse, our company values are Respect, Integrity, Innovation, Stewardship and Excellence. This Vendor Code of Conduct (“Vendor Code”) sets forth the requirements that we expect our Vendors to comply with in order to operate lawfully, ethically and with integrity in every jurisdiction where they conduct business. This Vendor Code applies to all Vendors on a global basis regardless of location of services.

For purposes of this Vendor Code, “Vendor” includes an entity or individual contracted to provide services to, or act on behalf of Guidehouse.

This Vendor Code does not address every action that may be considered unlawful or unethical and it is not a summary of all policies that apply to Vendor activities. Vendors must comply fully with all applicable laws, rules and regulations that govern the services provided by the Vendor to Guidehouse. If an activity is legal in a local jurisdiction but is in violation of this Vendor Code, the Vendor will meet the standards of this Vendor Code. The Vendor Code is not intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict between the terms of a Vendor agreement and this Vendor Code, Vendors will first comply with applicable laws, rules and regulations, then the Vendor agreement, followed by the Vendor Code.

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Our Code as Your Guide

ANTI-BRIBERY & ANTI-CORRUPTION

Guidehouse will not tolerate bribery or any form of corruption. All Vendors must comply with all applicable anti-corruption laws and regulations, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Vendors are prohibited from offering or making any improper payments of money or anything of value to domestic or foreign public officials or private sector (commercial) entities or their employees in order to improperly induce or secure any improper advantage. This prohibition applies even in locations where such activity may not violate local law.

Vendors are expected to exert due diligence to prevent and detect corruption in all business arrangements including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

INTERNATIONAL TRADE SANCTIONS LAWS

All Vendors must conduct business in accordance with applicable laws, directives, and regulations related to international trade sanctions laws. This includes laws and regulations related to import and exports, sanctions, and anti-boycott regulations.

ANTITRUST LAWS

Vendors must not fix prices or rig bids or engage in any other form of anti-competitive behavior with their competitors. Vendors may not improperly exchange current, recent, or future pricing information with competitors. The criminal provisions of the antitrust laws prohibit, among other things, any agreement between competitors regarding prices to be charged, competitive bidding, clients to be solicited or geographic areas to be served.

EMPLOYEE HEALTH AND SAFETY LAWS

Guidehouse is committed to providing a healthy and safe work environment. To that end, Vendors must comply fully with all health and safety laws, rules and regulations. It is the responsibility of all Vendors to prevent accidents by maintaining a safe work environment and following safe work procedures and practices.

It is Guidehouse policy to forbid the possession and use of illegal drugs by any Vendor while engaged on Guidehouse business or in the workplace. There is no valid reason ever to be in possession of a weapon or firearm while on Guidehouse property or at a client's premises.

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ENVIRONMENTAL LAWS

Guidehouse's policy is that Vendors must strictly obey all applicable environmental laws and regulations. Any Vendor who knowingly or negligently violates requirements or prohibitions of such laws, including the stated conditions of approved permits, can be subject to substantial fines and penalties, both civil and criminal.

GIFTS, ENTERTAINMENT, & HOSPITALITY

Vendors shall not offer any gifts, entertainment, or hospitality that are or could be perceived as bribes or that could by a reasonable third party be otherwise perceived as intended to improperly influence business decisions. Any gift, entertainment, or hospitality offered or accepted must be permitted by law and regulation, the recipient's organization, and must be reasonable in the ordinary course of business.

ANTI-HUMAN TRAFFICKING AND ANTI-MODERN SLAVERY

Guidehouse is committed to providing a work environment that treats individuals equitably and humanely and expects the same from its Vendors. Vendors may not use involuntary labor of any kind and must comply with minimum legal age and wage requirements. All workers must be provided a healthy and safe work environment. Vendors shall 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.

All Vendors must take steps to ensure that slavery and human trafficking are not taking place as part of their business or supply chains. Vendors are expected to fully comply with all anti-human trafficking and anti-modern slavery laws. For more information on Anti-Modern Slavery, please see www.guidehouse.com.

INSIDER TRADING

All Vendors must comply with insider trading laws. Vendors who have access to, or knowledge of, material nonpublic information from or about a client of Guidehouse are prohibited from buying, selling or otherwise trading in the client's stock or other securities.

CONFLICTS OF INTEREST

Business decisions should be made in the best interest of Guidehouse, not motivated by personal interest or gain of the Vendor. Vendors should avoid all conflicts of interest and should not participate in or promote any Guidehouse transaction, policy, or decision in which the Vendor has a financial interest or a personal interest in the matter. The Vendor should disclose any actual or potential conflicts involving Guidehouse.

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CONFIDENTIALITY

Vendors must maintain the confidentiality of all information entrusted to them by Guidehouse, Guidehouse clients, or others with whom Guidehouse may conduct business, except when disclosure of such information is specifically authorized or required as a matter of law. Guidehouse's confidential information includes any information that has not been made available to the public that provides insight into its current or anticipated business activities. Confidential client information includes important nonpublic information entrusted to Guidehouse by its clients and other firms with which Guidehouse has business dealings.

WORKPLACE CONDUCT

Vendors must endeavor to deal fairly and in good faith with Guidehouse's clients, suppliers, competitors, shareholders and employees. No Vendor 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.

Guidehouse's policy is to select, place and work with all Vendors without discrimination based on race, color, national origin, gender, age, religion, disability, veteran's status, actual or perceived sexual orientation, or gender identity or expression, or any other basis protected by law, ordinance or regulation. Equal opportunity is one of Guidehouse's firmest and most basic beliefs.

Further, it is the responsibility of every Vendor to help Guidehouse provide a work atmosphere free of harassing, abusive, disrespectful, disorderly, disruptive or other nonprofessional conduct. Sexual harassment in any form, verbal or physical, by any Vendor will not be tolerated.

PROTECTION AND PROPER USE OF GUIDEHOUSE ASSETS

All Vendors must protect Guidehouse's assets and ensure their efficient use for Guidehouse's business. Such assets include, without limitation, Guidehouse real property such as computers and other IT equipment, and intellectual property such as Guidehouse name, logos, trademarks, patents, copyrights, brands, trade names, confidential information, ideas, plans and strategies. Theft, carelessness and waste by a Vendor has a direct impact on Guidehouse's profitability. When collecting, transferring and otherwise handling information provided to Vendors by Guidehouse or its clients, Vendors must always follow the agreed upon information security procedures, and use secure, approved technologies.

BOOKS AND RECORDS

Financial information, Vendor files, and other corporate data should meet a single standard: complete integrity and transparency. Financial data must be complete and current with all assets, funds and liabilities fully and properly recorded. Vendors must 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. Vendors are expected to cooperate fully with Guidehouse's auditors with regard to Guidehouse engagements and records related to such engagements.

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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.

ETHICS PROGRAM EXPECTATIONS

Commensurate with the size and nature of their business, Vendors will have a program in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Vendor Code.

Vendors must 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.

REPORTING REQUIREMENTS

Violations or suspected violations of this Vendor Code should be reported to your primary Guidehouse contact, or to Guidehouse Ethics & Compliance at ethics@guidehouse.com or to the Ethics Hotline at www.guidehouse.ethicspoint.com. Depending on the nature and severity of the violation, the contract with the Vendor may be terminated.

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. Vendors to Guidehouse must ensure that AI is used responsibly and in accordance with all applicable laws.

For example, Vendors must ensure that AI is used responsibly and in accordance with all applicable laws. Vendors 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 vendors must guard against uses of AI that result in biases or discrimination against individuals or groups. Vendors 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. Vendors 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.

Thank
You

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