

# Code of Conduct



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# A Message From Our President and CEO

At Guidehouse, our values of **Respect, Integrity, Innovation, Stewardship and Excellence** are the core to our culture and establish our standards of expected ethical behavior. The WAY we conduct our business is as important as the services we provide. We will not compromise our values to achieve our business objectives. By embodying these values into our business, we are helping to ensure our continued success and reputation.

This Code of Conduct provides guidance on critical policies and regulations that impact our business operations and where to go for help when the answer is not clear. We are all expected to abide by our Code and with the more detailed policies and procedures set forth in the Guidehouse Employee Handbook and other corporate policies. This Code is not intended to cover every applicable law or address every ethical issue that an employee may confront. Ultimately, no Code of Conduct can replace good judgement and responsible behavior, including knowing when to seek guidance on the appropriate course of action.

It is important to know that this Code applies to all Guidehouse personnel in every part of the business, level or area. In addition to our Code, our business partners and suppliers are subject to our Supplier Code of Conduct which is based on the same values as this Code.

If you are ever in doubt about the right course of action or observe an action inconsistent with our values or Code, I strongly encourage you to raise the issue with your supervisor or to any of the many other resources available to you. Know that Guidehouse will not tolerate retaliation against anyone for asking questions or raising concerns in good faith.

Thank you for your ongoing commitment to living our values every day. I am proud of all that we have accomplished together and know that, together, we'll continue to make a positive difference while building trust and preserving our reputation.



Scott McIntyre

## **Respect**

We rise by illuminating the diversity each person brings, ensuring all can shine.

## **Integrity**

We rise by being courageously ethical and charting the right course.

## **Innovation**

We rise by combining deep expertise with boundless creativity to deliver outstanding results.

## **Stewardship**

We rise by helping our people grow, our business succeed, and communities thrive.

## **Excellence**

We rise by being committed, refusing average and constantly evolving.

## We Report Ethical Concerns

We all have the obligation to speak up when something doesn't feel right. All personnel have the responsibility to report concerns about possible violations of the Code, company policies, laws and regulations. Guidehouse managers and supervisors are expected to lead by example, create a work environment that reflects our values, and hold their teams accountable for maintaining compliance. If you observe or suspect illegal or unethical behavior, you are expected to raise the issue to your engagement leader, sector leader, Human Capital representative, Ethics & Compliance, or the Office of General Counsel (OGC).

Always keep in mind that it's safe to speak up at Guidehouse.

- While Guidehouse offers these multiple channels to encourage open dialogue internally, you are also free to raise concerns or participate in an investigation by 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](http://www.dodig.mil/hotline) to report issues related to fraud, waste, abuse, and mismanagement under the purview of DoD.

Retaliation against employees who raise concerns in good faith is strictly prohibited. If you report a concern, it will be handled with appropriate confidentiality and discussed with others only as needed or advisable under the circumstances.

Violations of this policy may result in disciplinary action depending on the nature and severity of the violation, up to and including termination of employment.

The Ethics Hotline is another resource for asking a question or raising a concern. All matters are taken seriously and handled confidentially. If you prefer, you may submit your report or concern anonymously. You can report your concern by phone or web at [www.guidehouse.ethicspoint.com](http://www.guidehouse.ethicspoint.com).

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com) with questions.

## We Maintain a Respectful, Inclusive, and Safe Work Environment

**Diversity, Equal Opportunity and Inclusion** — We bring together employees with a wide variety of backgrounds, skills and cultures. We value different ideas, opinions, and experiences and are committed to sustaining a culture of inclusion and diversity. Combining a wealth of talent and resources creates the diverse and dynamic teams that consistently drive outstanding results. Diversity alone is not enough. Inclusion leverages the power of our differences to achieve our goals.

**Equal Employment Opportunity** — Guidehouse is an Equal Opportunity/Affirmative Action employer and committed to providing Equal Opportunity in Employment to all applicants and employees regardless of race, color, religion, sex, age, national origin, military status, veteran status, handicap, physical or mental disability, sexual orientation, gender identity, genetic information or any other characteristic protected by law. This commitment must be followed in all aspects of employment and personnel practices.

**Promoting a Respectful, Harassment-Free Work Environment** — Treating each other with respect, courtesy, and dignity is as important as the quality of our interactions with clients and business associates. We do not tolerate harassment, discrimination or retaliation.

**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.

**Workplace Violence** — Violent acts or threats of violence (whether directly or indirectly or made by words, gestures, or symbols) will not be tolerated. Workplace violence infringes on Guidehouse's ability to provide a safe, productive workplace. This applies to threats made on company or client property, anywhere on company business, or at company-sponsored events. If you have been the target of or learned of violence or threats of violence, please contact a Human Capital representative or the Chief Human Capital Officer.

If the situation is urgent and your personal safety is at risk, call 911 or your local law enforcement immediately and then alert Guidehouse Security and your local building security.

**Health and Safety Laws** — Guidehouse is committed to providing a healthy and safe work environment. To that end, we must comply fully with all federal, state and local health and safety laws, rules and regulations. It is your responsibility to prevent and report accidents by maintaining a safe work environment and following safe work procedures and practices.

It is our policy to forbid the possession and use of illegal drugs by any employee while engaged on company business or in the workplace. The responsible use of alcohol is not prohibited, provided that such use does not affect your work or your relationships with fellow employees and does not contravene otherwise applicable laws or client rules, for example when you are working at client locations.

Guidehouse prohibits the possession of a weapon or firearm while on company property or at a client's premises.

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com), [hr1@guidehouse.com](mailto:hr1@guidehouse.com), or [security@guidehouse.com](mailto:security@guidehouse.com) with questions.

## We Conduct Business with Integrity

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.

### Conflicts of Interest

Conflicts of interest can arise both from personal relationships and interests and through corporate-level activities which impair ability to give objective advice to our clients and create unfair competition.

- Personal conflicts of interest can arise from personal financial holdings, personal and professional relationships, outside activities and volunteerism, or through other market-facing relationships.
- 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.

Guidehouse policy requires immediate disclosure of any personal or organizational relationships that may create an actual, potential, or perceived conflicts of interest. Should a situation or relationship present a conflict, consult with the partner in charge of your engagement or business unit, an appropriate Human Capital representative, or by contacting Ethics & Compliance.

### Fair Competition

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.

### Insider Trading Laws

We do not engage in insider trading or tipping others. Inside information is nonpublic information about a company that may be of significance to an investor. It is illegal to trade securities based on inside information or to advise others to do so based on information that you have obtained.

### Licensing and Credentialing

Many of us require licensure, certification or credentialing in order to provide services to our clients. We are each personally responsible for meeting all licensing, registration, and certification requirements wherever we provide services to clients.

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com) with questions.

# We Conduct Business with Integrity

## **Self-Reporting of Suspension or 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**

We comply with US laws and regulations as they relate to internal company operating and financial matters through:

- Accurate and proper completion of company reports, including time and expense reports, vouchers, bills, financial statements, payroll and service records, measurement and performance records, and other essential data.

- Advising clients and suppliers of any clerical or accounting errors as soon as they emerge, as well as promptly correcting errors through credits, refunds, or other mutually acceptable means.

## **Corporate Opportunities & Clients**

Guidehouse personnel are prohibited from (a) taking for themselves personally opportunities that properly belong to the company 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 the company during the period of their employment.

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com) or the Office of the General Counsel with questions.

## We Do Not Engage in Bribery or Corrupt Activities

All our interactions with third parties (whether clients, suppliers, or the government) will be free from any corruption.

### **Gifts and Entertainment**

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.

The exchange of modest gifts or entertainment 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 intended to influence decisions that should be based solely on business considerations.

In addition, 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. We must avoid creating an actual or perceived conflict of interest. We are strictly prohibited from offering anything of value in exchange for an official act by a government official or employee. The company has zero tolerance for bribery and any other forms of corruption.

- 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.

### **Anti-Corruption**

Trust and integrity are the foundation of our company. We have zero tolerance for bribery and any other forms of corruption. We do not bribe or engage in corrupt practices with any government official or commercial party.

- Foreign Corrupt Practices Act — The US Foreign Corrupt Practices Act (FCPA) makes it illegal to make or offer payments or anything of value (monetary or non-monetary) to foreign governments, foreign officials, foreign political parties, or candidates for foreign political office, directly or indirectly, to gain business or favorable government action.

### **Anti-Money Laundering**

We do not support or engage in any form of money laundering activity. All Guidehouse personnel are expected to remain vigilant in identifying red flags and escalating them for investigation.

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com) with questions.



## We Do Not Engage in Bribery or Corrupt Activities

### **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. 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, managing director, or Guidehouse Board member, their spouse/domestic partner or dependent children make a contribution to a political candidate that is 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.

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com) or the Office of the General Counsel with questions.

## We Comply with Export Control and Sanctions Laws

While we must respect cultural differences and business norms, we cannot violate applicable laws or regulations in the US or any jurisdiction in which we work or reside. Violation of these laws can result in fines, criminal penalties, and reputational harm for both you and the company.

### **Export-Controlled Information**

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.

### **Complying with Sanctions and Anti-Boycott laws**

Guidehouse will comply with all applicable economic sanctions and anti-boycott laws and regulations. Guidehouse has zero tolerance for non-compliance with such regulations.

### **Embargoed Countries and Restricted Parties**

Guidehouse will not conduct business with countries or parties subject to restricted or excluded status by the US government. 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.

- Since the lists of embargoed countries and restricted persons and entities change frequently, consult Ethics & Compliance if you have any questions about the company's ability to do business in a particular country or with a particular person or entity.

### **Cooperation with Boycotts**

We comply with US laws that prohibit cooperation with foreign economic boycotts of countries friendly to the US. 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.

Please contact [ethics@guidehouse.com](mailto:ethics@guidehouse.com) with questions.

## We Are Committed to Environmental Stewardship

We see environmental stewardship as critical to the long-term success and sustainability of our business and our clients' businesses. We will responsibly manage our natural resources to help minimize our impact on the planet.

### Employees

Guidehouse will encourage employees to participate in optional programs through which we can utilize our shared wealth of knowledge to improve upon our environmental performance. We will guide employees to make meaningful changes in their everyday life and move toward more sustainable behavior. Guidehouse also aims to help communities improve their environmental health through sustainability initiatives and volunteering.

### Energy & Emissions

Guidehouse is committed to pursuing activities which lower our climate impact. Currently, we do this by monitoring our comprehensive greenhouse gas footprint yearly and have committed to setting reduction targets in line with climate science through the Science Based Target Initiative (SBTi). In addition, we've committed to offsetting the impact of our global office-based electricity use (scope 2 emissions) 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 and encourage employees to reduce waste through sustainable procurement. We aim to reduce our water consumption wherever feasible, especially in high water risk locations.

### 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.

### Compliance

Guidehouse recognizes the importance of environmental regulations. We ensure continued compliance on all applicable environmental laws and legislations. We are committed to reviewing and updating our environmental policy when appropriate.

Please contact add [sustainability@guidehouse.com](mailto:sustainability@guidehouse.com) or [ethics@guidehouse.com](mailto:ethics@guidehouse.com) with questions.

## We Safeguard the Information and Assets Entrusted to Us

### **Sharing Only with Those Who Need to Know**

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.

### **Information Security**

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.

### **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.

These assets should not be used for anything other than a legitimate business purpose and in accordance with Guidehouse policies and any applicable contracts.

### **Use of Personal Devices and Accounts**

Personal computers and personal email, social media and Internet storage accounts must not be used for Guidehouse work. All mobile devices used for Guidehouse work must be registered and secured by Guidehouse.

Please contact [information.security@guidehouse.com](mailto:information.security@guidehouse.com) with questions.

## We Protect the Guidehouse Reputation

### Public Communications

You must seek approval from Marketing prior to developing any public communication, such as lectures, books, blogs, or thought leadership pieces.

### Social Media

We must take care that when engaging on social media, we appropriately safeguard the confidentiality and privacy of the company and its clients. You are expected to follow company policies and relevant laws in any social media activity representing or referencing Guidehouse.



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Please contact [marketing@guidehouse.com](mailto:marketing@guidehouse.com) with questions.