



Document Number:	LEGAL.EC.009	Version No.	2.2
Functional Area:	Ethics & Compliance	Version Effective Date:	December 20, 2023
Region:	Global	Date of Last Review:	December 20, 2023
Document Owner:	Chief Ethics & Compliance Officer	Review Cycle:	Annual

# Reporting Concerns

## 1.0 Purpose

Guidehouse is committed to maintaining and fostering a strong ethical culture. Consistent with that goal, the purpose of this Reporting Concerns Policy ("**Policy**") is to encourage Personnel and Third Parties to promptly report Concerns without fear of retaliation. This Policy provides information on the internal procedures and associated requirements to raise Concerns in good-faith.

## 2.0 Scope

This policy applies to all Guidehouse Personnel.

## 3.0 Definitions

- **Guidehouse** – shall refer to Guidehouse Inc. and its direct and indirect subsidiaries. Certain subsidiaries may have country-specific Reporting Concerns policies which apply to those employees.
- **Personnel** – shall refer to all Guidehouse employees.
- **Third Parties** – shall refer to any person who performs or performed work for Guidehouse, other than on the basis of an employment agreement (including agency workers, consultants, volunteers, interns, job candidates, shareholders and members of the administrative, management or supervisory body, self-employed contractors, subcontractors and suppliers and anyone working under the supervision of them).
- **Concern** – shall refer to (suspected) wrongdoing, as well as actual or potential breaches of law, regulation, or Guidehouse Policy.
- **Guidehouse Policy** - shall refer to the Code of Conduct, relevant Employee Handbook, and all other Guidehouse policies to which an employee is subject. Guidehouse policies can be found on the Intranet.

## 4.0 Policy

### 4.1 Good Faith Reporting

All Personnel have the responsibility to report suspected, potential, and known Concerns. Reports must be made in good faith. Providing information known to be false or intentionally misleading is a serious matter that could result in discipline up to and including termination.

Resources available to you to report a concern are detailed in Section 5 of this policy.

Business Internal/General

The current version of this policy is posted on the Guidehouse Intranet. Hardcopies are uncontrolled and should be validated prior to use.

## **4.2 No retaliation**

Guidehouse prohibits any form of retaliation and will protect all individuals against any form of reprisal for reporting a Concern in good faith, or for cooperating with any investigation. The protection against retaliation also applies to any person who assists a reporter in the reporting process in a work-related context, any third person who is connected with the reporter and who could suffer retaliation in a work-related context (such as colleagues or relatives of the reporter) and legal entities that the reporter owns, works for or is otherwise connected with in a work-related context.

Any Personnel found to have engaged in any form of retaliatory behavior will be subject to disciplinary action up to and including termination.

## **4.3 Investigations, Anonymity and Confidentiality**

### **4.3.1 Anonymity**

Guidehouse's Ethics Hotline is maintained by a third-party vendor in order to allow for reports to be submitted anonymously if preferred and permitted in accordance with local law. The Ethics Hotline provides functionality that allows the investigator to correspond with the reporter completely anonymously.

### **4.3.2 Confidentiality**

All reported Concerns will be investigated thoroughly and in a fair and impartial manner. Ethics and Compliance may transfer a report it receives to another internal department (e.g. Human Capital, Finance & Accounting, Information Security) depending on the nature and severity of the concern.

Regardless of whether a report is made anonymously, investigations are conducted confidentially to the greatest extent possible. Information regarding a complaint will be disclosed only on a "need-to-know" basis. Individuals whose responsibility it is to conduct the investigation are prohibited from discussing the matter outside of the investigation.

When a report is received, Guidehouse reserves the right to put interim measures in place, such as a leave of absence (with or without pay upon company discretion and subject to local law) while the investigation proceeds. Guidehouse will take further appropriate action once the investigation has been completed.

## **4.4 Additional Responsibilities for Managers**

Managers may be subject to discipline, up to and including an unpaid suspension or termination, and/or other appropriate corrective action, for failing to report suspected harassment, discrimination, retaliation, other illegal conduct or violation of Guidehouse policy or otherwise knowingly allowing harassment, discrimination, retaliation, other illegal conduct or violation of Guidehouse policy to continue.

## **4.5 Disciplinary Action**

If an investigation reveals a violation of a law, regulation, or Guidehouse Policy, or other inappropriate conduct has occurred, Guidehouse will take appropriate disciplinary action based on the severity of the matter and subject to local laws, up to and including termination.

Business Internal/General

The current version of this policy is posted on the Guidehouse Intranet. Hardcopies are uncontrolled and should be validated prior to use.

Disciplinary measures may also apply to anyone who directs or approves infractions or has knowledge of them and does not move to correct them or report them.

If the subject of an investigation is not employed by Guidehouse, then the Company will take whatever corrective action is reasonable and appropriate under the circumstances.

## **5.0 Guidance**

Personnel should exercise professional skepticism and raise issues as they occur or are identified. If something does not feel right, you are aware of an issue, or you have reservations about behavior that might be inconsistent with Guidehouse's values, please report your concerns. Identify the resources and procedures available to help you and choose one that you are comfortable with to assist in working through the situation.

### **5.1 Resources**

Reports can be made to your manager or supervisor, Pathfinder or Career Guide, Human Resources Business Partner, directly to Ethics and Compliance, or via the Ethics Hotline.

The Ethics Hotline allows for anonymous reporting, and representatives can be reached 24 hours a day, 7 days a week. The Ethics Hotline is accessible at [www.guidehouse.ethicspoint.com](http://www.guidehouse.ethicspoint.com). Reports can be submitted online or by phone. Local laws in some countries may prohibit certain types of concerns from being reported through the Ethics Hotline, and, in such cases, Personnel should report the concerns in accordance with the country-specific policy.

More information and resources can be found on the Ethics & Compliance intranet page.

## **6.0 Questions & Concerns Reporting**

If you have questions on this policy, contact Ethics and Compliance.

Concerns regarding this policy should be reported immediately to Ethics and Compliance at [ethics@guidehouse.com](mailto:ethics@guidehouse.com) or to the Ethics Hotline at [www.guidehouse.ethicspoint.com](http://www.guidehouse.ethicspoint.com).

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

Business Internal/General

The current version of this policy is posted on the Guidehouse Intranet. Hardcopies are uncontrolled and should be validated prior to use.