

# Human Rights Policy

As amended effective 9/1/2024

At Huron, our values shape the way in which we serve our clients, treat each other, and give back to our communities. Core to these values is a commitment to:

- Inclusion - embracing different perspectives that draw on the strength of our diversity;
- Integrity - doing the right thing regardless of the consequences; and
- Impact - having a positive, lasting impact on the organizations and communities we serve.

As a result, we maintain a work environment where human rights are upheld, harassment and discrimination are not tolerated, and diversity and inclusion are fostered and supported. This commitment extends beyond our workforce and into our communities where we strive to help shape a better future for all. Huron complies with applicable laws across our work locations to promote equal employment opportunities for our employees and to prohibit all forms of discrimination and harassment. However, we do more than simple compliance with laws. We work to provide an inviting, equitable and inclusive work environment for our employees, enabling them to grow their careers and shape their futures. These standards apply to all our business operations regardless of geographic location.

## Upholding Human Rights

This policy is in alignment with the UN Declaration of Human Rights and Guiding Principles on Business & Human Rights and underpins our commitment to human rights while reinforcing the values that guide how we interact with each other, our clients, third party vendors and other external stakeholders. Huron operates its business in a way that meets and exceeds fundamental responsibilities in the areas of human rights, labor, and anti-corruption. Because of the nature of the services we provide as well as the policies and procedures in place that govern employee conduct, we consider ourselves to be at very low risk of slavery, unlawful child labor or human trafficking existing within our own business. We prohibit our employees from engaging in the aforementioned practices and if an employee knows or suspects the occurrence of these activities, they have a duty to report that information immediately.

Regarding our supply chains, we make little use of services demanding unskilled labor and those products and services we use are sourced from reputable suppliers. Our dealings with third-party suppliers reflect our values and our respect for human rights. We expect all of our vendors to treat everyone with dignity, free from unlawful discrimination or harassment and forced labor. We are committed to working with our vendors as they uphold these principles. We screen our vendors against a database comprised of information from approximately fifty government agencies to determine if any sanctions have been imposed on the vendor. To minimize exposure to the risk of slavery or human trafficking in our supply chain, we periodically assess our vendor contracts and sourcing processes so that our zero tolerance towards slavery, unlawful child labor and human trafficking is upheld.

Huron is committed to protecting the rights of minority groups and women. In addition, Huron strictly prohibits all forms of discrimination and harassment of any employee based upon that person's race, color, creed, religion, ethnicity, national origin, sex, marital status, genetic information, pregnancy, disability, sexual orientation, veteran status, age, FMLA status, gender identity, gender expression or any other basis protected by law. Huron has adopted an internal reporting process in furtherance of its commitment to preventing discrimination and harassment. Any reported incidents are promptly, impartially and thoroughly investigated and appropriate disciplinary action, up to and including termination, is taken if it is determined that an employee has violated this policy. Employees have multiple venues for reporting violations of our discrimination and harassment policy including to a human resources business partner, the employee's supervisor or managing director, the Corporate Vice President of Human Resources, the Chief Compliance Officer, or the General Counsel. In addition, employees may report harassment, discriminatory treatment, or grievances on an anonymous basis through Huron's helpline by calling 1-800-690-8135. Huron strictly prohibits retaliation against any person for reporting harassment, or for assisting or participating in an investigation into harassing or discriminatory behavior. As part of our commitment to human rights, we provide reasonable working hours and a fair, living wage for our employees, and we support the right of access to water as a fundamental human right.

## Prioritizing Health and Safety

The safety and security of our employees is one of our top priorities. Employees are expected to adhere to good health and safety practices, refrain from any conduct or misconduct that they know or reasonably ought to know is dangerous to their own health and safety or to that of their colleagues and comply with applicable health and safety regulations. Employees are encouraged to advise the company in a timely manner of any dangerous or hazardous workplace conditions of which they are aware. In addition, Huron maintains a violence free workplace policy with zero tolerance for any acts or threats of physical violence, including intimidation, harassment and/or coercion. More information about our health and safety policies can be found [here](#).

## Fostering Diversity and Inclusion

Inclusion is more than a corporate value for Huron. It is a fundamental belief and practice that we encourage and foster in our work environment every day. One way Huron makes an inclusive environment a reality is through our employee resource groups known as iMatter teams. These teams work directly with our Global Diversity & Inclusion (GD&I) Council to help identify strategies that enhance diversity and foster inclusion while creating a greater sense of community within the company. The GD&I Council includes our executive leadership team and is accountable for driving our diversity and inclusion strategy enterprise wide. We have nine iMatter teams, which provide frequent opportunities for employees who share a common interest to interact, learn about different perspectives, and support each other's professional growth and development. Membership in an iMatter team is not limited to a particular affinity group; any employee who supports the purpose of an iMatter team, and is committed to being an ally, is welcome and encouraged to join.

Huron's commitment to diversity and inclusion is evidenced by a five-part action plan. Through this plan we:

- Continue to foster an inclusive culture that encourages diversity, through various strategies, including cultural sensitivity, unconscious bias and allyship workshops;
- Advance diverse representation across all levels of our organization by building a diverse candidate pipeline through a broad range of recruitment sources and strategies, expanding professional development opportunities for all employees globally, including employees in underrepresented minority groups and women, and by setting workforce demographic goals;
- Expand community outreach and support through community service initiatives, financial support to organizations committed to social justice and racial equality, work study programs and pro bono services;

- Perform pay equity studies on a regular basis to ensure pay is equitable among employees performing similar jobs
- Strengthen vendor processes and evaluate our suppliers to help ensure alignment with Huron's values and diversity commitment.

Our ability to attract, retain and develop exceptional professionals with diverse backgrounds and life experiences helps us bring more innovative and creative solutions to bear as we work with our clients and grow our business, creating opportunities for all.

## Managing Responsibly

Huron's Code of Business Conduct and Ethics (the "Code") highlights our ethical way of doing business and is rooted in our reputation for integrity, responsibility and trust. We hold our employees to the highest standards and expect all employees to comply with the laws, rules and regulations that apply to our business. We reinforce our expectations through regular mandatory training on all Huron compliance policies, including the Code. Employees are encouraged to ask questions if they need guidance or raise any ethical concerns with the assurance that the employee will not be retaliated against. The Company also has a 24-hour Helpline which all stakeholders of Huron can use to report any concerns. For more information about our Code, [click here](#). In addition, Huron remains committed to protecting the privacy and data of everyone we interact with in compliance with the data protection laws where we operate around the world. Our compliance and trust-based approach to privacy incorporates privacy by design and best-practice approaches to help us build and deliver products and services that exceed business needs and client expectations while protecting data. Huron's cybersecurity controls and practices also involve every employee in the vigilant protection of our data and our clients' data through technology and training. Our cybersecurity program is aligned with industry standards and continuously evolves to detect and protect against existing and emerging threats.

## Training

Huron employees receive training on a variety of human rights-related matters. In addition, Huron requires that all employees complete compliance training both upon hire and annually thereafter. This training includes, among other topics, our Code of Business Conduct and Ethics as well as our Anti-Bribery and Corruption, Cybersecurity, and Privacy policies. In addition, although not currently mandated by law in every state or country in which we do business, Huron believes that requiring training on sexual harassment prevention offers important benefits for all employees and aligns with our core values. Requiring all employees to participate in sexual harassment training helps Huron foster an inclusive and harassment free environment, reduce employee turnover, and minimize risk. Huron also offers unconscious bias and allyship training for all employees to help ensure our workforce is creating an inclusive environment that supports our enterprise efforts to foster a diverse and inclusive workplace.

## Doing Our Part as a Global Corporate Citizen

We strive to look for ways to support the promotion of human rights beyond our business operations. To that end, Huron Helping Hands ("HHH") serves as the foundation for how we give back to the communities in which we live and work. Through HHH, we bring our commitment to strengthening our communities to life and align our corporate social responsibility efforts to the following UN Sustainable Development Goals: (1) promoting good health and well-being, (2) quality education, (3) gender equality, (4) decent work and economic growth, and (5)

climate action. HHH uses four main avenues to extend our reach beyond our workplace to the broader community: community service events, matching gifts, pro bono projects and charitable contributions.

- **Community Service/Volunteering:** The focus of Huron's community service program is to work with organizations that assist people in need who may otherwise not have access to resources in their communities, such as local food banks, relief agencies, at-risk youth programs, and education. Organizations must be tax exempt under IRS code section 501(c)(3). This program also promotes a sense of community among our colleagues as employees spend time volunteering with each other.
- **Matching Gifts:** Huron has a program which matches employees' monetary donations, up to \$500 per employee, to U.S. based non-profit and tax-exempt educational, health, social, or cultural organizations and eligible Canadian organizations. Through our matching gifts program, Huron is able to support those organizations that matter to our people and enable meaningful contributions.
- **Charitable Contributions:** Through our financial support of key fundraising events and programs, Huron is able to extend the reach of the civic organizations we support.
- **Pro bono:** Huron provides pro bono services to 501(c)(3) organizations whose missions align with our priority SDGs. We use our expertise and skillsets to provide operational, strategic, or technology-related solutions that have a meaningful impact on these organizations who are serving the broader community.

We will periodically review this policy so that it reflects our ongoing commitment to human rights, input from our internal and external stakeholders, as well as emerging requirements and best practices that apply to our business operations.