Huron Non-Retaliation Policy

Huron will not tolerate retaliation by any employee, contractor, vendor, or other member of the Huron workforce against any individual who, in good faith, reports a potential violation of business-related laws, regulations, or Huron policy.

Retaliation may involve actions such as intimidation, threats, discrimination, attempted coercion, or adverse employment consequence. This Policy will be applied consistently without regard for an individual's level or tenure with Huron. Violations of this policy will result in disciplinary action up to and including termination.

Adverse actions taken against an employee based on the employee's job performance or conduct that warrants disciplinary action will not be considered to be retaliation.

Procedures for reporting suspected retaliation
Any individual who believes that he/she has been retaliated against or who believes that retaliation has occurred against another person should notify any member of Huron's Human Resources Department, Huron's Chief Compliance Officer, the Legal Department, or Huron's Helpline, so that the reported actions can be reviewed and investigated.

The following FAQs help clarify this Policy and how it will be implemented.

FAQs

1. **What constitutes retaliation?**
    - Huron's adherence to a zero tolerance, non-retaliation policy applies to all forms of retaliation. Examples of prohibited retaliatory actions include: intimidation, unlawful discrimination, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit, and threats to impose any of these prohibited actions for reasons unrelated to job performance or to conduct that warrants disciplinary action.
    - While every circumstance must be evaluated on a case by case basis, an action may be reviewed as retaliatory if it would deter others from raising complaints or concerns in the future. A non-retaliation policy is intended to protect an employee's rights to complain
      or report a suspected policy violation.
    - Our policy is intended to protect an employee from the level of retaliation that produces an injury or harm. The significance of an act in producing harm will depend upon the circumstances and environment surrounding the act. For example, it may not be significant if a supervisor doesn't invite an employee to lunch. But if that lunch involves a team training presentation that would help support the employee's professional development, and the employee has recently reported a suspected policy violation; the supervisor could be seen to be engaging in retaliation.

2. **Who is responsible for making sure that an investigation is made?**
   - Under Huron's Code of Business Conduct and Ethics, the Chief Compliance Officer is to be informed of suspected violations of Huron policies and is responsible to ensure that reports are investigated and that appropriate disciplinary action is recommended.

3. **Will Huron actually investigate every report of alleged retaliation—regardless of the level of the person who has been accused of committing a retaliatory act?**
   - Yes, we take every report very seriously and investigate all reports.

4. **Retaliation may be difficult to prove. What are some of the factors that are considered in determining whether there has been retaliation against an employee?**
   - The investigator will look at a variety of factors to determine if the employee is the victim of retaliation. Such factors include: was the employee treated unequally from others in a similar situation, is there a pattern of adverse actions taken against complaining employees, and what was the rationale for the alleged act of retaliation.

5. **Can I report the retaliation anonymously?**
   - Yes, the Huron Helpline enables employees to make anonymous reports of suspected violations such as retaliation.

6. **Will Huron keep my report confidential?**
   - Confidentiality will be maintained to the degree possible; however key Huron officials in areas such as Human Resources, Legal department, and Compliance will normally need to be aware and/or involved in the investigation. Additionally, the person accused of committing the retaliatory behavior will need to be aware of the allegation in order to respond to the investigation.

7. **Won't the person accused of retaliation be able to assume pretty easily that the alleged victim is the one who made the report to Huron?**
   - Not necessarily. Someone other than the victim, such as an observer or colleague, may report alleged retaliation. Additionally, in some cases, Huron proactively follows up with employees who have reported suspected violations in order to determine if retaliation has occurred, so some investigations of potential retaliation are initiated by Huron corporate compliance office.

Approved by CorporateCompliance Committee
April 24, 2014

Effective May 1, 2014