

Huron Consulting Group Supplier Code of Conduct (As amended effective January 1, 2023)

INTRODUCTION

At Huron Consulting Group (“Huron” or “the Company”), one of our core values is Integrity. Inherent in that value is our belief that acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Huron has developed this Supplier Code of Conduct to clarify our expectations in the areas of business integrity, confidentiality, labor practices, and safety. This Code is intended to complement [Huron’s Code of Business Conduct and Ethics](#) and any other Company policies referenced herein.

Any employee (including temporary), agent, contractor, consultant, or other representative of a Huron supplier or vendor of goods and services (hereinafter referred to as “Supplier”) is expected to follow this Code when performing work for or providing goods and services to Huron.

BUSINESS CONDUCT PRINCIPLES

Huron expects its Suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

- 1. Maintain awareness and comply with all applicable laws and regulations of the countries where they intend to operate, as well as those laws or regulations applicable to Huron’s business related to the services provided by Supplier.**
- 2. Compete fairly for Huron’s business and while conducting business on Huron’s behalf, without paying bribes, kickbacks or offering or giving anything of value to secure an improper advantage.**

Huron is committed to conducting business legally and ethically. Corrupt arrangements with customers, vendors, government officials, or other third parties are strictly prohibited. Suppliers must comply with Huron’s [Anti-Bribery and Corruption Policy](#), which, among other things, makes clear the Company applies a “zero tolerance” approach to acts of bribery and corruption by any of its employees or business partners working on the Company’s behalf. Any breach of that policy will result in possible termination of applicable third-party arrangements. Further, Suppliers are prohibited from providing or offering gifts or entertainment to Huron employees that could inappropriately influence Huron’s business decisions or gain an unfair advantage.

3. Protect Huron confidential information and that of Huron’s clients and employees.

Huron has a variety of information assets that are essential to its business. Suppliers often have access to Huron confidential and proprietary information during the course of their work for Huron. This information is the property of Huron and must be kept strictly confidential. In addition, Supplier must comply with Huron’s [Insider Trading Policy](#) in order to prevent trading in securities issued by Huron or its clients when Supplier receives or becomes aware of material nonpublic information about Huron or its clients. Supplier is also prohibited from passing such material nonpublic information to others who may trade based on that information.

Further, Huron recognizes the importance of privacy and confidentiality for our clients and employees. All Suppliers who will have access to Protected Health Information (PHI), as that term is defined by the Health Insurance Portability and Accountability Act (HIPAA),¹ are required to comply with Huron’s [HIPAA Compliance Program](#) as well as all applicable federal and state laws applicable to the protection of confidential health information.

4. Safeguard and protect all Huron property.

When authorized to use Huron property, supplies, equipment (such as laptops) and other assets, Suppliers are required to do so responsibly. Suppliers who have access to Huron technical resources are also required to comply with Huron’s policy on [Electronic Communication and Use of Technology](#).

Suppliers must also protect and responsibly use Huron trademarks, copyrights, trade secrets and other intellectual property when authorized to use such assets, including compliance with licenses and terms of use. Suppliers must not use any Huron trademark or other intellectual property unless expressly permitted to do so in writing by Huron.

5. Disclose information about all subcontractors to Huron upon written request.

Suppliers that have been authorized by Huron to employ downstream subcontractors to supply goods or services to Huron must disclose the names of all subcontractors to Huron upon written request. In addition, Suppliers must provide this Code to any downstream subcontractors and require them to comply with all applicable provisions of this Code. Suppliers will conduct appropriate oversight of their subcontractors and retain information necessary to demonstrate appropriate oversight and monitoring

¹ Protected Health Information is generally defined as all individually identifiable health information, including demographic data, medical histories, test results, insurance information, and other information used to identify a patient or provide healthcare services or healthcare coverage.

related to this Code. Suppliers will provide such documentation upon written request from Huron.

6. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

A Supplier's books, records and overall financial reporting must be transparent. That is, they must accurately reflect each of the underlying transactions. No accounting record or other document related to any transaction shall be falsified in any manner which may obscure or disguise the true nature of the transaction. A Supplier may not make or approve any payment in connection with work performed on behalf of Huron when there is an express or implied agreement that any portion of the payment is to be used for any purpose other than that described by the documentation supporting the payment.

7. Encourage a diverse work force and provide a workplace free from discrimination, harassment, or any other form of bias or abuse.

Huron prohibits discrimination on the basis of age, race, color, gender, marital status, sexual orientation, gender identity, pregnancy, national origin, religion, Vietnam era or veteran status, medical condition, genetic information, physical or mental disability or any other status protected by applicable law. Therefore, it is expected that Suppliers shall provide equal employment opportunities for its personnel and foster an inclusive work culture in which employees and business partners feel valued and respected for their contributions. Discrimination and harassment, including unwelcome verbal, visual, physical, or other conduct of any kind from Huron employees or Supplier personnel conducting Huron business that creates an intimidating, offensive, or hostile work environment will not be tolerated by Huron. If any Supplier personnel believes that he or she has been subjected to, witnessed or become aware of harassment or other discriminatory treatment, he or she should promptly notify the Huron project engagement lead or report the conduct through the Huron Helpline, as noted below.

8. Treat employees fairly, including with respect to hiring, wages, working hours and benefits.

Suppliers shall comply with all applicable legal and regulatory requirements and will follow sound employee relations practices. Wages and benefits provided by Suppliers will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits. Further, employment decisions by Supplier must be based on qualifications, skills, performance, and experience.

9. Provide safe and healthy working conditions

Suppliers shall manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are preventable. Suppliers must implement management systems and controls that identify hazards and assess and control risks related to their specific industry and the work environment.

10. Use only voluntary labor and prohibit the use of child labor and human trafficking in their operations.

The use of forced and child labor by a Supplier and/or its subcontractors is prohibited. Employment decisions must be based on free choice and there may be no coerced labor, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control.

11. Support compliance with this Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Huron.

To conduct business with Huron, Suppliers must enter into contracts and execute purchase orders that mandate compliance with this Supplier Code. With prior written notice, Huron may conduct reasonable audits to verify a Supplier's compliance with this Code.

12. Report suspected violations of the Supplier Code.

Suppliers may report suspected violations of this Code through the Huron Helpline at 1-800-690-1835 or at www.ethicspoint.com

Huron's Helpline is available 24 hours a day/7 days a week and reporters are provided the option to remain anonymous. All reports received through the Helpline are investigated and each investigation is treated confidentially. In addition, Huron prohibits any employee from retaliating against anyone who reports a concern in good faith through the Helpline.