

## SUPPLIER CODE OF CONDUCT

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## ALIGHT'S SUPPLIER CODE OF CONDUCT

### Preface

Alight is committed to ethical business practices and we expect our suppliers to hold the same high standards. It is fundamental that we comply with all applicable laws and regulations and to conduct our business in a sustainable, honest and ethical manner. This Code of Conduct (the "Code") sets out our expectation that our suppliers uphold Alight policies regarding compliance with all applicable law and regulation, respect for human rights, environmental precaution and the safety of products, services and work environment. Suppliers shall conduct their business in compliance to all laws, rules and regulations in the countries in which they operate.

This Code is continuously updated to reflect Alight's operations. Alight requires its suppliers to comply with this Code. In addition, our suppliers are expected to ensure that all their sub-contractors and sub-suppliers also comply with the standards set out in this Code.

This Code is based on the UN Global Compact principles and associated declarations.

## HUMAN RIGHTS

### Occupational safety

Exposure to potential safety risks (e.g. electrical and other energy sources, fire, vehicles, and fall risk) shall be mitigated through proper design, engineering and administrative controls, preventive maintenance and safe work procedures as well as ongoing safety training. Where risks cannot be adequately mitigated, workers shall be provided with appropriate and well-maintained personal protective equipment. Documented safety routines shall be communicated to all relevant workers. Workers shall not be disciplined for raising safety concerns.

Suppliers must comply with all applicable electrical design and installation standards (e.g. as issued by the Swedish National Electrical Safety Board's regulations and general advice). Suppliers must further comply with all applicable fall prevention requirements including, as relevant, fall prevention safety plans, training, monitoring, mitigation activities, corrective action plans as well as any additional activities to eliminate fall risk (e.g. the Swedish Work Environment Authorities Statute Book).

### Physically demanding work

Exposure to the hazard of physically demanding tasks shall be identified, evaluated and controlled. This includes manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.

### Machine safeguarding

Machinery shall be evaluated for safety risks. Physical guards, interlocks and barriers shall be provided and properly maintained where machinery presents an injury risk to workers.

### Occupancy injury and illness

Procedures shall be in place to prevent, manage, track and report occupational injury and illness, including procedures to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) provide necessary medical treatment, (iv) investigate cases and implement corrective actions to eliminate their causes and (v) facilitate return of workers to work.

### Humane treatment

All workers are to be treated with respect. There shall be no harsh and inhumane treatment, including any and all sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Neither shall there be any threat of such treatment. Any lawful disciplinary policies and procedures shall be clearly defined, documented and actively communicated to workers prior to application of such policies and procedures.

### Working hours

Work strain not only increase injury and illness but also reduce productivity and increase personnel turnover. Working hours shall not exceed the limitations set by applicable law. Notwithstanding this, a work week shall never exceed 60 hours per week (including overtime)

unless there is an emergency or other extraordinary circumstances. All workers shall be allowed at least one day off per seven-day week.

### Wages and benefits

Workers shall be reasonably compensated in compliance with applicable law, including minimum wages, overtime compensation and legally required benefits taking into consideration reasonable living expenses. Deduction of wages shall not be used as a disciplinary measure. Compensation shall be paid in a timely manner and documented.

### Industrial hygiene

Exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. Where risks cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

### Sanitation, food and housing

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage facilities and eating facilities. Worker dormitories provided by the Suppliers or a labor agent shall be maintained clean and safe, and with appropriate emergency exits, hot water for showering, adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

### Emergency preparedness

Potential emergency situations and events shall be identified and assessed. The impact of such events shall be minimized by implementing emergency plans and response procedures, including evacuation procedures, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

## LABOR STANDARDS

### Freedom of association and collective bargaining

Workers' right to associate freely, join or not join labor unions, seek representation and join

workers' councils as well as right of collective bargaining in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

### Non-discrimination

Suppliers shall be committed to a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in or permit discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training.

### No forced and compulsory labor

All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without any payment of fees or similar. Participation in or benefit from forced, bonded (including debt bondage) or indentured labor or involuntary prison labor, slavery or trafficking of persons is strictly prohibited, especially in the procurement, sourcing, supply chain, development, construction and operation of our projects. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. Workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment.

### Due diligence and transparency

Suppliers shall exercise due diligence as regards human rights, forced labor and child labor on the entire supply chain and make their due diligence measures available to Alight upon request.

### Abolition of child labor

Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is higher. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Special caution shall be observed for workers under the age of 18 and no work that is likely to jeopardize the health or safety of young workers shall be permitted.

## LOCAL STAKEHOLDERS

### Engagement

All communications with local community and stakeholders should be discussed with an Alight project manager beforehand and interactions should be recorded.

### Indigenous peoples

Reasonable efforts should be made to avoid adversely affecting Indigenous populations and territory.

### Local procurement and labor

Use of local procurement and labor should be considered for the development and management of the project. Local training and development are also encouraged.

## ENVIRONMENT

### Environmental policy

Environmental considerations in the practical work of Alight is further described in Alight's separate environmental policy. This section sets out fundamental environmental principles.

### Environmental permits and reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations shall be obtained, maintained and kept current and complied with.

### Hazardous substances

Avoid the use of hazardous substances and work to identify other non-hazardous options when possible. If substitute is not feasible, chemicals and other materials posing a risk if released to the environment shall be identified and managed to ensure their safe handling, recycling, reuse, and disposal.

### Materials restrictions

Suppliers recognize that environmental responsibility is critical to producing world class products. Suppliers shall comply with all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. In manufacturing operations, adverse effects on the community,

environment and natural resources shall be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001, the Eco Management and Audit System (EMAS) may be a useful source of additional information.

### Wastewater and solid waste

Solid waste (non-hazardous) and wastewater generated from operations, industrial processes and sanitation facilities shall be characterized, routinely monitored, controlled and treated as required prior to discharge. Measures shall be implemented to reduce generation of solid waste and wastewater.

### Pollution prevention and resource efficiency

The use of resources and generation of waste of all types, including water and energy, shall be reduced or eliminated at the source and/or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

### Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations shall be characterized, routinely monitored, controlled and treated as required prior to discharge. Suppliers shall conduct routine monitoring of the performance of its air emission control systems and avoid open burning of waste.

### Biodiversity

Avoid impacts to biodiversity and ensure activities are compliant with what was stated in the Environmental Impact Assessment or similar documents.

## BUSINESS INTEGRITY

### Corruption and financial crime

The highest standards of integrity shall be applied in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings shall be transparently performed and accurately reflected on Suppliers' business books and

records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption regulation.

### Reporting irregularities

Suspected irregularities can be reported to the Alight Whistleblowing Channel. Reports are anonymous and confidential, and handled by external third parties.

### Conflict of Interest

Suppliers shall avoid conflicts of interests that may compromise the supplier's credibility or third parties' confidence in Alight.

### Export control and sanctions

Suppliers shall respect and comply with all applicable laws and regulations regarding export control, trade bans and economic sanctions, especially financial sanctions from the European Union (EU), the United Nations (UN), the United States of America (US) and the United Kingdom (UK).

### Competition law

Suppliers shall respect and comply with all applicable competition laws and regulations.

### Non-retaliation

Suppliers shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

### No improper advantage

Means of obtaining undue or improper advantage, including bribes, shall not be permitted or accepted.

### Fair business, advertising and competition

Standards of fair business, advertising and competition shall be applied. Customer information shall be safeguarded with appropriate means of protection.

### Conflict minerals

Suppliers shall take all reasonable measures to ensure that tantalum, tin, tungsten and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in any country, including the Democratic Republic of the Congo and adjoining countries. Suppliers shall exercise due diligence on the source and chain of custody of

these minerals and make their due diligence measures available to Alight upon request.

### Disclosure of information

Information regarding business activities, ownership, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

### Intellectual property

Intellectual property rights shall be respected. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

### Protection of identity

Programs that ensure the confidentiality and protection of whistleblowers shall be upheld.

### Privacy

Suppliers shall be committed to protecting the privacy of personal information of everyone suppliers do business with, including supplier representatives, customer representatives, consumers and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, transmitted, shared and otherwise processed.

The undersigned confirms to comply with the core principles provided in this Code.

Company name:

Date:

\_\_\_\_\_  
Name