

Vendor Code of Conduct



updated: 06/2024

WilsonHCG

Vendor Code Of Conduct

Welcome to working with WilsonHCG, Inc! The Company is proud to present the following Vendor Code of Conduct. This Vendor Code of Conduct is part of WilsonHCG's wider environmental, social, and governance ("ESG") initiatives. The Company's ESG initiatives aim to address the challenges and opportunities of our changing world. By taking care of the environment, we reduce our carbon footprint and contribute to a more sustainable future. By caring for our people and communities, we foster a culture of diversity, inclusion, and engagement, which enhances our innovation and performance. By adhering to high standards of governance, we ensure transparency, accountability, and ethical conduct in all our decisions and actions.

WilsonHCG, Inc ("we", "us", "our") and its affiliates (WilsonHCG) are committed to the highest standards of service quality and business integrity. WilsonHCG requires all of its vendors and suppliers ("Vendor", "you", "your") and employees to conduct themselves with the highest standards of honesty, fairness, and integrity, complying with all applicable laws and avoiding the appearance of impropriety. We also strive to be an asset to the community and society at large by supporting social, cultural, intellectual, environmental, and economic initiatives, while improving the quality of life of our workforce and their families at the same time and we expect our Vendors to do the same.

This Vendor Code of Conduct ("Code") outlines our expectations when engaging in providing products and services to WilsonHCG. Vendors are expected to act in accordance with this Code, including aligning guidelines, policies, and practices, and communicating and enforcing the Code provisions throughout the organization's own vendors.

Vendors must act with integrity and are expected to demonstrate a commitment to legal, ethical, safe, fair, and environmentally responsible business practices.

We are an inclusive culture and do not believe discrimination in any form should be tolerated. Vendors are expected to demonstrate a commitment to inclusive business practices, including without limitation diversity in their workplace.

Vendor shall ensure that its employees, subcontractors, agents, and third parties assigned to provide services to WilsonHCG consistently with this Vendor Code of Conduct. Additionally, WilsonHCG may require Vendor to immediately remove any Vendor employee or representative that acts inconsistently with this or any other WilsonHCG policy. Failure to adhere to this Code of Conduct will result in disqualification from consideration for future business with WilsonHCG and may result in termination of existing business. Vendors may contact WilsonHCG's Legal Department at legal@wilsonhcg.com for questions relating to its obligations under this policy.



Ethics & Compliance

Vendor shall comply with all laws, regulations, and policies applicable to it and its dealings with WilsonHCG, including employment laws prohibiting discrimination and harassment. If this Code of Conduct or any other applicable WilsonHCG policy conflicts with applicable law, applicable law will govern such conflict to the extent it is impossible for Vendor to comply with both the law and the policy. If this Code of Conduct conflicts with any other applicable WilsonHCG policy, this Code will govern to the extent it is impossible for Vendor to comply with both policies.

International Trade Compliance

You must conduct business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software, and services; (b) import of goods; (c) economic sanctions and embargoes, and (d) U.S. antiboycott requirements.

Ethics and Compliance Program

Commensurate with the size and nature of your business, you must have management systems, tools and processes in place that (a) ensure compliance with applicable laws, regulations and the requirements set forth in this Code; (b) promote an awareness of and commitment to ethical business practices, including, without limitation, the expectations set forth in this Code; (c) facilitate the timely discovery, investigation, disclosure (to WilsonHCG and others, as appropriate) and implementation of corrective actions for violations of law, regulations or the expectations set forth in this Code; and (d) provide training to your employees on compliance requirements, including the expectations set forth in this Code.

Business Integrity

Vendors to WilsonHCG are expected to operate in compliance with all applicable laws and regulations of the countries, states, and localities in which they operate. This includes laws and regulations related to ethical business practices, quality, labor and employment practices, as well as health, safety, and environmental protection. Suppliers are also expected to conform their practices to generally accepted industry standards, obtain and maintain all applicable permits, licenses and registrations, and operate in accordance with permit limitations and requirements at all times.

Unfair Business Practices

WilsonHCG is committed to competing fairly and in compliance with the antitrust and competition laws in every country where it does business. Vendor shall comply with all applicable fair business, advertising, and antitrust competition laws; Vendor shall not fix prices, rig bids, allocate customers or markets, or exchange current, recent, or future pricing information with Vendor's competitors.

Legal & Customer Requirements

Vendors shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.



Your Obligations as Business Partners

If your contract with WilsonHCG prohibits you from assigning, delegating, or subcontracting your obligations, we expect you to strictly comply with this prohibition. If your contract with WilsonHCG permits you to assign, delegate, or subcontract your obligations or procure products or services from others that will be incorporated in products or services acquired by WilsonHCG from you, we expect you to carefully select your business partners and perform due diligence, audit, and oversight to prevent and detect misconduct. You must flow down the principles set forth in this Code to these business partners and we will hold you responsible for ensuring compliance by your business partners.

Government Procurement

In some cases, our partners are assisting us with fulfilling government contracts. Accordingly, and wherever applicable, we recognize that the requirements related to government contracts are generally stricter than those governing our commercial contracts. It's important that you recognize that, too, and comply with all contractual terms and obligations. Remember, your contractual obligations also apply to the vendors and subcontractors who provide services or perform work on our government contracts.

Vendors must take special care to comply with the unique and special rules that apply to contracting with the U.S. Government. If you support a WilsonHCG contract with the U.S. Government, you must at all times follow the U.S. Government's rules for competing fairly, honor restrictions applying to U.S. Government employees (e.g., receipt of gifts and employment), deliver products and services that conform to specifications, laws, and regulations, adhere to government accounting and pricing requirements, claim only allowable costs, ensure the accuracy of data submitted and comply with all other applicable U.S. Government requirements.

Gifts, Gratuities Travel, & Entertainment

Vendors shall not directly or indirectly provide any gift, travel, entertainment, political contribution, or charitable donation of any value to a WilsonHCG employee or any third party on behalf of WilsonHCG. Vendor may offer a WilsonHCG employee a gift, travel, or entertainment only if it is: (a) appropriate (no cash or cash equivalents or other excluded gift type), does not create an actual impropriety or a perception of impropriety, and complies with all laws, regulations, and policies for all parties), (b) of reasonable value, and (c) with full transparency of its value.

Conflicts of Interest

A conflict of interest arises when a WilsonHCG employee's personal interest interferes with the best interests of WilsonHCG. It may occur when an employee or a family member or friend receives a personal benefit as a result of the employee's position with WilsonHCG. Vendor shall disclose to the WilsonHCG Ethics Office (ethics@wilsonhcg.com) all relationships that have the potential to create a conflict of interest or the appearance of a conflict of interest. Vendor shall correct any actual or perceived conflict of interest as directed by WilsonHCG.

Accuracy of Records and Submissions

Vendors must maintain books and records that accurately and completely reflect all transactions related to WilsonHCG business and each of your submissions to WilsonHCG, its customers, and regulatory authorities must be accurate and complete. You must never make an entry in your books and records to alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to WilsonHCG business.

Accordingly, WilsonHCG expects vendors to provide honest and accurate invoices. Invoices should be itemized, quote the PO number (where relevant), be supported by appropriate documentation and comply with all other requirements as set out in the relevant contract(s). Invoices may not be split to circumvent approval requirements.

Fraud Prevention

In carrying out duties for WilsonHCG and in your general business conduct, you must not initiate, participate or assist in fraudulent or dishonest activities. Such activities include, but are not limited to: theft, embezzlement or misappropriation of WilsonHCG funds or property, or the property or funds of others; falsification, misuse, or unauthorized removal of client or WilsonHCG records; false representation or concealment of information.

Insider Trading

Federal and state laws prohibit trading in securities by anyone with material information not available to the public. Vendor's interactions with WilsonHCG may result in Vendor having access to material, nonpublic information about WilsonHCG or another company (including WilsonHCG's customers, suppliers, and other business partners). Vendor shall not engage in any action to take advantage of that information, including buying or selling Vendor's or that company's securities or sharing that information with others.

Bribery

Bribery is offering or making a payment (or payment in kind) and/or offering/promising a gift to influence a decision dishonestly or to induce or reward a person for improper performance of any relevant function or activity. This includes both private and public bribery.

WilsonHCG does not tolerate corruption or bribery in any form and we expect our vendors to fully comply with requirements of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

Vendors will not directly or indirectly give, offer, or accept anything of value to obtain or retain business or favored treatment, to influence actions or to obtain an improper advantage for WilsonHCG, itself, or any third party. This includes any benefit, fee, commission, dividend, gift, cash, gratuity, services, consideration or any inducements of any kind to any WilsonHCG representatives, officers, agents or employees of WilsonHCG.

Furthermore, vendors will ensure the same of any affiliates, retained agents, subcontractors, intermediaries or workers. This prohibition extends not only to public officials, candidates for office, and workers of state-owned enterprises, but also to workers or officers of counterparties, clients/customers, suppliers, any agent of the aforementioned parties, or any other person with whom the firm does or anticipates doing business.

All purchases made by WilsonHCG will be made on the basis of price, quality, and service, and WilsonHCG will deal with its vendors fairly, honestly and openly. WilsonHCG employees are required to conduct all business and interactions with vendors in strict compliance with the applicable provisions of WilsonHCG Code of Conduct.

Anti-Corruption

WilsonHCG is committed to doing business with integrity and in compliance with the highest anti-corruption standards. Corruption violates the public's trust, threatens economic and social development, and hurts fair trade. WilsonHCG shall comply with the U.S. Foreign Corrupt Practices Act, all similar anti-corruption and bribery laws in other countries. Vendors shall not engage or attempt to engage in bribery, extortion, or embezzlement. Supplier shall conduct itself with honesty, fairness, and high ethical standards, avoiding even the appearance of impropriety in all its business interactions worldwide.

Antitrust Law

WilsonHCG competes fairly and expects our partners to share our unwavering commitment to conducting business and winning with integrity. Comply with all antitrust and global competition laws wherever you operate, and never enter into any agreement that unlawfully restricts competition. Further, vendors must abide by fair business practices, including truthful and accurate advertising.

Anti-Money Laundering

WilsonHCG abides by all laws designed to deter criminal enterprise, prevent terrorism and protect the national security of the companies where we do business. Exercise good judgment when dealing with customers or other business partners to prevent inadvertent use of WilsonHCG's business activities for money laundering or terrorist financing.

Tax Evasion & the Facilitation of Tax Evasion

WilsonHCG takes a zero-tolerance approach to our vendors committing or facilitating tax evasion. Vendors (and each of their subcontractors) are expected to have policies and procedures in place to prevent employees and other associated persons from committing or facilitating tax evasion.

Unauthorized Lobbying & Speaking to the Press

Vendor shall not undertake any type of lobbying or other similar representative efforts on WilsonHCG's behalf before any kind of government entity, official, body, or representative without the express written consent of WilsonHCG. Suppliers shall make no statements to the press about or on behalf of WilsonHCG unless expressly authorized to do so by WilsonHCG.

Confidential Information

Proper management of confidential information and personal data is critical to the success of both WilsonHCG and Vendors. WilsonHCG vendors must protect all WilsonHCG information, data (including personal data), and intellectual property or technologies with appropriate safeguards. Vendors may receive our confidential information only as authorized by a confidentiality or non-disclosure agreement and must comply with their obligations not to disclose the confidential information, not to use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. This requirement prevails beyond contract expiry or termination.

Intellectual Property Rights

WilsonHCG's intellectual property is among its most valuable assets and WilsonHCG is committed to protecting it. WilsonHCG's intellectual property includes: brands, logos, slogans, domain names, business names, and other identifying features used to identify WilsonHCG and its products or services; software, scripts, interfaces, documentation, advertising and marketing materials, content (such as website content) and databases; trade secrets, ideas, inventions, systems and business processes; and confidential information, as addressed above in section (VI)(L) "Confidential Information" of this Code.

Vendors shall comply with all applicable intellectual property rights and laws. As business partners supporting WilsonHCG's efforts, suppliers shall respect WilsonHCG's intellectual property rights, protect WilsonHCG's trade secrets and confidential information, and safeguard customer information. Vendors shall manage technology and know-how in a manner that protects intellectual property rights. Accordingly, the Vendor shall only use information technology and software that it has acquired or licensed legitimately and shall use them only in accordance with the terms of such licenses. Vendor shall not transfer any of WilsonHCG's technology, proprietary information, or trade secrets without prior written consent from WilsonHCG's Legal Department.

Accordingly, Vendors must use WilsonHCG's intellectual property only as required to provide services to WilsonHCG. Intellectual property created while carrying out the duties of your engagement with WilsonHCG, or using any WilsonHCG resources, is owned by WilsonHCG, unless otherwise specified in any written agreement between you and WilsonHCG. You shall provide assistance as requested by WilsonHCG, both during and after engagement or appointment, in connection with its attempts to evidence, register or enforce its rights in such intellectual property, including the rights afforded by trademarks, copyrights and patents. WilsonHCG may require you to waive or assign all rights, title and interest in such intellectual property to WilsonHCG.



Use of WilsonHCG and Affiliates Names and Logos

WilsonHCG prohibits suppliers' use of WilsonHCG or any affiliate companies' name or logo for any purpose without express written authorization. This includes, but is not limited to: public announcements, press releases and media activity, advertising, endorsements, customer or client listings and photographs of WilsonHCG and its companies' aircraft, buildings, equipment and branded products in supplier publications. As a general rule, WilsonHCG and its companies will not permit the use of their names for media, advertising and marketing purposes, however any such requests should be sent to: marketing@wilsonhcg.com.

Social Media

Your personal communications should not identify WilsonHCG or your engagement to provide products or services to WilsonHCG. Do not use WilsonHCG letterhead, envelopes, fax cover sheets, or other communication materials containing WilsonHCG's name, logo or trademark for your personal communications unless you are authorized to do so by WilsonHCG. In particular, in any personal communication with politicians, public officials, industry or professional associations, the media or the general public, you should not lead people to believe that you are expressing the views of WilsonHCG. Public Communications and Social Media You shall not comment or provide information relating to WilsonHCG's businesses with respect to any products and/or services you provide in public forums (including internet chat rooms, bulletin boards, blogs, social and business networking sites) unless you are specifically authorized to do so by WilsonHCG. You should not make any statements on behalf of WilsonHCG.

Privacy & Data Protection

Vendor shall respect the reasonable privacy and confidentiality expectations of everyone with whom it does business and shall appropriately protect all data that may come into its possession because of its relationship with WilsonHCG, including data relating to WilsonHCG and WilsonHCG employees, customers, and partners. Vendor shall comply with WilsonHCG's instructions and with applicable privacy, data protection, and security laws and regulations when personal, confidential, proprietary or other sensitive information is collected, stored, processed, transmitted, or shared. Vendors shall use WilsonHCG-provided information technology and systems only for business-related purposes authorized by WilsonHCG.

Data and information may only be disclosed to the extent necessary for it. In case of doubt, consultation must be sought. Vendors shall comply with all applicable data protection laws and regulations, as amended from time to time. Vendors shall provide all employees who come into contact with such data or information with the appropriate training pursuant to the relevant data protection laws and regulations and require them to keep the data and information confidential. Declarations of compliance are to be submitted to WilsonHCG or its Legal Department upon request at privacy@wilsonhcg.com. Additional information about WilsonHCG's privacy policy can be found [here](#).

Supply Management System

Vendors are expected to have a management system that ensures they comply with applicable laws, regulations, and WilsonHCG policies, conform to this Code of Conduct and identify and reduce risks related to this Code. The system should also promote continuous improvement and compliance with changing laws and regulations.

Supplier Diversity

Vendors shall engage socially and economically different categories of vendors through inclusive sourcing processes that promote equal opportunities.

Communication

WilsonHCG Vendors are expected to assist WilsonHCG in enforcing this Code of Conduct by communicating its principles to their supervisors, officers, employees, suppliers, and third parties through their respective supply chain. Vendors may direct questions or comments about this Code of Conduct to legal@wilsonhcg.com.

Management Systems

Vendors to WilsonHCG are expected to manage their activities systematically in order to maintain business continuity, meet the standards set forth in this document and to improve their operations continually.

Anonymous Reporting & Reporting Misconduct

We expect Vendors to provide their employees and Vendor's business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this Code by Vendor or Vendor's business partners, without fear of retaliation, including opportunities for anonymous reporting.

In the event that you become aware of misconduct related to WilsonHCG business undertaken by any WilsonHCG employee, any of your employees, or any employees of your business partners, we expect you to promptly notify WilsonHCG. You may contact WilsonHCG at legal@wilsonhcg.com, or if you prefer to contact WilsonHCG anonymously, please submit your feedback on this [form](#).

Vendors must promptly investigate reports of legal or ethical issues or concerns.

Emergency Preparedness & Response

Vendors shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact by implementing emergency plans and response procedures.

Additionally, Vendors should minimize the impact to life, environment, and property of emergency situations and events through the implementation and testing of emergency plans and response procedures.

Commitment & Accountability

Vendors shall demonstrate senior management commitment and accountability through policies, objectives and formal processes, to the concepts described in this document by allocating appropriate resources.

Risk Management

Vendors shall have mechanisms to determine and manage risks in all areas addressed in this Code. To that end, Vendors should provide resources, including competent personnel and appropriate infrastructure, to manage risks and ensure conformance to this Code.

Documentation

Vendors shall implement processes to develop, maintain and control documents and records necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

Training & Competency

Vendors shall have a training program that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address these expectations.



Additional Considerations

Continual Improvement

Vendors are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

WilsonHCG's Global Human Rights Policy

WilsonHCG committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. We expect our vendors to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

WilsonHCG recognizes its responsibility to protect human rights.

Examples of such rights are articulated in internationally recognized standards, including the Universal Declaration of Human Rights, and the International Labor Organization (ILO) Core Conventions. Our position is reflected in our Human Rights Statement and our actions in the countries in which we do business. We expect our vendors to have similar policies and practices that apply to all workers, suppliers, and their supply chains, including migrant and temporary workers.

Non-Discrimination

Vendors shall provide a workplace free of harassment and discrimination. Vendors must treat their existing and prospective employees and business partners fairly, based only on merit and other factors related to your legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.

Military Veteran Hiring Practices

The veteran hiring landscape has transformed over the past few years, which means companies, including WilsonHCG Vendors, need to constantly evolve their veteran hiring practices to match the changing veteran talent market and the changing needs of veterans.

Accommodations

Vendors shall make reasonable accommodations for disabled employees and applicants, as required by law. Accordingly, Vendors shall provide assistance or changes to a position or workplace that will enable a qualified employee to do his or her job despite having a disability. Vendors shall provide these accommodations so that employees with disabilities can enjoy the benefits and privileges of employment equal to those enjoyed by similarly-situated employees without disabilities.

Fair Treatment

Vendors must treat all workers fairly and ethically with respect and dignity. Vendors may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. Vendors may not use monetary fines to discipline employees. In addition, WilsonHCG Vendors must provide an environment that allows employees to raise concerns without fear of retaliation.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Vendors shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Child Labor

Vendor must ensure that child labor is not used in the performance of your work, whether or not related to WilsonHCG business. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

Forced Labor & Human Trafficking

Vendors shall not use any form of slave, bonded, forced, involuntary prison labor or engage in human trafficking or exploitation. Employment should be freely chosen and employees free to leave after reasonable notice is served. WilsonHCG suppliers should not retain employees' identification papers or travel documents such as Passports, Identification Cards and Work Permits as a condition of employment.

WilsonHCG does not tolerate slavery, forced labor, or human trafficking in any form and WilsonHCG will not knowingly work with vendors who engage in these practices or permit their subcontractors to engage in these practices.

We expect our vendors to fully comply with requirements of applicable slavery, forced labor and human trafficking laws, including without limitation the UK Modern Slavery Act 2015.

All work must be performed under and in accordance with contracts that have been entered into voluntarily. Vendors must not use involuntary labor of any kind, including prison labor, debt bondage, or forced labor by governments.

Vendors must not engage in practices associated with forced labor. These practices, identified by the International Labour Organization (ILO), include withholding of wages, retention of identity documents, and restriction of movement. Vendors should put into place measures that ensure workers are not exploited by third-party labor providers, such as recruiters or agencies. Such measures include caps on or elimination of recruitment fees; provision of contracts to all workers in their native language or other language which they are able to understand; elimination of deposits paid by workers to vendors or recruiters to secure jobs. Additionally, vendors must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

Hiring & Employment Practice

Vendors' hiring practices must include verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available. In addition, a written contract should be made available to each worker that clearly communicates the conditions of employment in a language understood by the employee. WilsonHCG Vendors must not discriminate against employees in hiring, promotion, and salary or performance management on the basis of race, color, gender, religion, nationality, age, disability, political affiliation, union membership, sexual orientation, maternity or marital status of the employee. WilsonHCG Vendors are expected to support diversity and equal opportunity in their workplaces. The Vendor shall not require employees to undertake pregnancy or medical tests, except where required by local law or in relation to workplace health and safety, and shall not discriminate based on results.

Compensation & Working Hours

Vendors should provide wages and benefits that meet or exceed the requirements of local law. At a minimum, vendors should pay workers regularly and timely, the legal minimum wage, the prevailing industry wage, or the wage negotiated in an applicable collective agreement, whichever is higher. All other types of legally mandated benefits must be provided as required by law, including, as applicable, paid leave, pension, statutory insurance, health benefits, maternity leave, parental leave, family care leave, and childcare benefits. All overtime work must be performed and compensated in accordance with the law and the individual's employment contract or other applicable contract or collective agreement.

Health & Safety

Vendors must provide workers with a safe and healthy work environment and should proactively put in place measures such as policies, procedures, education, and communication that support accident prevention and minimize health risk exposure for all employees. Where appropriate the supplier shall provide personal protective equipment together with training on its benefits and use.

Where provided, workers' living quarters should be clean and safe and meet the same health and safety standards as those that apply in the workplace.

Environmental Responsibility

Vendors shall operate in an environmentally responsible and efficient manner, and they shall minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle.

Environmental Authorizations

Vendors shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations, and restrictions shall be obtained, and their operational and reporting requirements followed.

Waste & Emissions

Vendors shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

Animal Welfare

Where applicable, vendors agree to treat animals humanely, including with minimal stress and pain. Alternatives to animal testing should be used whenever possible.

Compliance with this Code

Vendors must ensure that WilsonHCG has the right to assess their business partners' compliance with the expectations set forth in this Code in performing work for WilsonHCG, including on-site inspection of facilities and review of associated books, records, and other documentation. Vendors must ensure that their business partners will provide WilsonHCG upon request with additional information and certifications evidencing compliance.

In the event of any wrongdoing, you will fully cooperate with any related investigation conducted by WilsonHCG. Vendors will ensure that their business partners also fully cooperate if such an investigation involves their performance. Vendors (and their business partners) must correct any non-conformances identified during assessments. WilsonHCG does not assume any duty to monitor or ensure compliance with this Code, and Vendors acknowledge and agree that they are solely responsible for full compliance with this Code by Vendor's directors, officers, employees, representatives, and business partners.

For questions or concerns about this Code, including its application to specific circumstances in connection with your organization's performance of work for WilsonHCG, or suspected failures by your organization to satisfy these expectations in performing work for WilsonHCG, please contact WilsonHCG at legal@wilsonhcg.com, or if you prefer to contact WilsonHCG anonymously, please submit your feedback on this [form](#).

Transparency & Disclosure

Vendors to WilsonHCG are expected to make reasonable efforts to publicly disclose topics and goals that are important to the organization's impact on the environment and social issues (e.g., on a website or publicly available report).

Monitoring & Compliance

WilsonHCG may engage in monitoring activities to confirm a Vendor's compliance with this Code, including on-site assessments of facilities, use of questionnaires, review of available information or other measures necessary to review supplier's performance. WilsonHCG may disqualify any potential supplier or terminate any relationship with a current supplier that has failed to conform to these Standards.

Vendors' implementation of and adherence to these principles can be demonstrated by reference to their own Code of Conduct or corporate policy which contains comparable standards. Should a Vendor not have such standards in place, the Vendor is expected to undertake compliance with this Code of Conduct.

This Code sets forth our expectations for current and future Vendors. We expect all new and existing Vendors to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labor rights, Vendor diversity and inclusion and environmental areas. Any facts or circumstances which are likely to lead to your inability to meet the requirements and expectations of this Code should be reported immediately to your WilsonHCG relationship manager. In line with the WilsonHCG Business Integrity Program, we provide our people and the public with various channels through which integrity concerns can be raised without reprisal. If you encounter what you believe to be any potential integrity concerns, including but not limited to violation of local laws or regulations, or this Code, or unethical behavior, you may report your concerns via the methods outlined above.

WilsonHCG has established conduct standards for its business-related practices that are set out in our Business Conduct Guidelines. These WilsonHCG Business Conduct Guidelines ("Guidelines") reflect our commitment to our values of honesty, integrity, respect, and responsibility. WilsonHCG expects that its vendors will share and embrace these values as well as our commitment to regulatory compliance.

While Vendors are independent entities from WilsonHCG, the business practices and actions of a Vendor, when conducting business with or on behalf of WilsonHCG, may significantly impact and reflect upon our Company. Because of this, WilsonHCG expects all Vendors and their employees, agents, and subcontractors to follow our high ethical standards set forth in these Guidelines, while they are conducting business with us or on our behalf.

It is the responsibility of our Vendors and representatives to understand and adhere to WilsonHCG's expectations. Vendors should notify a member of WilsonHCG management if and when any situation develops that causes the Vendor or representative to operate in a way that may be in conflict with WilsonHCG's expectations. WilsonHCG may request the removal of any Vendor or representative who behaves in a manner that we consider to be acting inconsistent with these Guidelines or any WilsonHCG policy.

