

# ALIXPARTNERS SUPPLIER CODE OF CONDUCT

## INTRODUCTION

At AlixPartners we conduct business worldwide, in various cultural, political, and economic environments. Our work is complex and fast-moving. These conditions can create complexity for our employees and add pressures to succeed. We publish a **Code of Conduct** for our own personnel that serves as a framework for making sound decisions and guides us in how to embed our Core Values into our business activities.

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To supplement the internal Code we have published this **Supplier Code of Conduct** to describe the expectations of all suppliers engaged in providing goods and services (“suppliers”) to AlixPartners and to its clients on behalf of AlixPartners. AlixPartners is committed to the highest standards of ethics and integrity and expects our suppliers to uphold that same standard. This AlixPartners **Supplier Code of Conduct** outlines our expectations of the behavior, principles and integrity of our suppliers and the way they conduct business.

We expect Suppliers to follow this Code and, at minimum, to comply with all applicable laws and regulations within the locations in which they operate. We will also seek to work with suppliers who embody our Core Values and who take proactive steps to embody the values and goals outlined in this **Supplier Code of Conduct**.



# ORGANIZATIONAL STRUCTURE

AlixPartners is a results-driven global consulting firm that specializes in helping businesses successfully address their most complex and critical challenges. AlixPartners, LLP (Delaware) is the parent company within the AlixPartners group comprising a number of separately constituted and regulated legal entities providing advisory services across several jurisdictions, including AlixPartners Ltd in the United Kingdom and its subsidiaries. The AlixPartners Group employs over 2,000 people world-wide, operating in twelve countries throughout Europe, the Middle East, the Americas, and Asia. This **Supplier Code of Conduct** applies to all suppliers to the AlixPartners Group.

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# COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

All suppliers engaged in providing goods and services to AlixPartners, or to AlixPartners' clients on behalf of AlixPartners, are expected to adhere to the standards described in this **Supplier Code of Conduct**. We reserve the right to evaluate Supplier's compliance with the Code during supplier evaluation and selection, to periodically request completion of self-assessment of compliance with the Code, and to seek to correct violations of the Code. Suppliers who are found to be in violation of the Code will be evaluated, and AlixPartners reserves the right to seek remediation or termination of its relationship with suppliers in violation.

AlixPartners maintains a global independent ethics hotline which permits employees or other concerned individuals about misconduct or breaches of law to report concerns in confidence and anonymity, where permitted by local law, and without fear of retaliation or disciplinary action. If you believe an AlixPartners supplier has violated this **Supplier Code of Conduct** or if you become aware of misconduct on the part of AlixPartners or its employees, you may make a report at [www.alixpartnersintegrityline.com](http://www.alixpartnersintegrityline.com).

Each Supplier must commit that it will not retaliate against anyone for making a good faith report of suspected violations of this or any other Code of Conduct, or for cooperating in an investigation. This means that no one can take disciplinary action against or mistreat another individual for seeking guidance or raising a concern. Suppliers must be committed to conducting fair and objective investigations within their own organizations.

# OUR POLICY

## Ethics, integrity and fair business practices

AlixPartners Core Values include our **Commitment** to assist our clients in reaching their objectives in an ethical and professional manner. We also have a Core Value of **Professionalism**, in which we commit to observe principles of objectivity, independence, and due care, and to maintain all of our relationships based upon mutual trust. We expect our employees to conduct themselves according to the highest ethical, professional, and legal standards, and expect our suppliers to conduct themselves to the same standards.

### **BUSINESS AND REPORTING PRACTICES**

We expect suppliers to act with integrity and have policies and practices in place which guard against improper business practices such as: misuse of assets, corruption, bribery, extortion, and embezzlement.

In addition, we expect suppliers to have a policy and process to allow concerned parties to report workplace concerns that is transparent, accessible, and designed to protect reporting individuals from retaliation.

### **BRIBERY AND CORRUPTION**

Suppliers must comply with all applicable bribery and anti-corruption laws including, but not limited to, the U.S. Foreign Corrupt Practices Act and UK Bribery Act. Suppliers must never request, authorize, pay, promise, give or offer anything of value with the hope of securing unfair business advantages for the supplier, AlixPartners or any other related party.

The global laws on bribery and corruption and our Anti-Bribery Policy strictly prohibit any AlixPartners people or representative working on our behalf from offering or accepting bribes or kickbacks in any form. This includes our suppliers.

### **INSIDER TRADING AND NON-PUBLIC INFORMATION**

Suppliers with access to material non-public information regarding AlixPartners or its clients must adhere to the laws, rules, and regulations that govern "insider trading" and to have and enforce a securities trading policy. "Material non-public information" is information that is not available to the public which, if disclosed, a reasonable investor would likely consider important in deciding whether to buy or sell securities. Suppliers must prohibit both the purchase and sale of publicly traded securities by employees in possession of any material non-public information and the communication of material non-public information to others (commonly known as "tipping"). These prohibitions and limitations must apply to workers and their immediate family members.

### **FAIR COMPETITION**

We promote fair competition and good corporate citizenship, and do not engage in behavior that undermines free and fair competition. There are many laws which govern behavior for competing in the marketplace. These vary widely from anti-trust, anti-competition, and anti-tax evasion laws to prohibitions against the use of forced labor in our supply chain. We commit to complying with these laws and expect our suppliers to do the same.

## Labor and human rights

### **MODERN SLAVERY AND HUMAN TRAFFICKING**

AlixPartners maintains a Modern Slavery and Human Trafficking Policy, which expresses our fundamental opposition to modern slavery and human trafficking and our commitment to acting ethically and with integrity in all our business dealings and relationships. We explicitly prohibit forced, compulsory, and child labor in our supply chains.

Suppliers must adhere to regulations prohibiting human trafficking and must comply with all applicable local laws in the areas where they operate. We seek to deal with suppliers that are also diligent with their own supply chains to combat modern slavery and human trafficking.

### **HUMAN RIGHTS**

Suppliers must respect the rights of workers to freely associate, must comply with applicable wage and hour laws, and must prohibit discrimination. Suppliers are encouraged to support and respect the human rights described in the UN Declaration of Human Rights and the International Labour Organization's Fundamental Conventions.

### **HEALTH AND SAFETY**

Our standard, at a minimum, is to follow all laws and regulations designed to protect the health and safety of our workforce, and we expect our suppliers to uphold that same standard. Suppliers must comply with all local laws and regulations with regards to workplace safety, and suppliers are expected to provide a safe and secure work environment for all their workers that is free from unnecessary danger.

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## Data privacy and security

### **CONFIDENTIAL INFORMATION AND PERSONAL DATA**

Suppliers must design, implement and maintain processes to appropriately protect AlixPartners' and its clients' confidential information and personal data of AlixPartners' and its clients' staff and customers.

Whether relating to staff, clients, or others associated with the firm, our work often includes being trusted with confidential information and personal data. We demonstrate our Core Value of **Professionalism** by understanding that this information was provided to us with the requirement that we will use and safeguard it appropriately, avoiding misuse or unauthorized access or disclosure. We expect our suppliers to do the same.

Suppliers must comply with all applicable laws with respect to the protection and use of confidential information and personal data and use it only in accordance with our contractual agreements.



## Diversity and inclusion

### **PERSONAL RESPECT AND DIVERSITY**

Our Core Value of **Personal Respect** requires that we treat one another with personal respect and value the unique differences among us. Each of us has an obligation to uphold AlixPartners' high ethical standards by always treating our colleagues, and anyone else we encounter, with fairness, personal respect, and dignity. We do this by respecting each other's contributions regardless of individual characteristics, background, or position. We value the diversity of our people and our firm culture that promotes personal respect, trust, and open communication.

### **SUPPLIER DIVERSITY**

AlixPartners is committed to developing a diverse supply chain, and we operate a supplier diversity program which tracks and encourages the use of qualified diverse suppliers within the United States. We believe that a diverse supplier base that includes (subject to local laws) representation from small businesses, minority-owned businesses, veteran-owned businesses, women-owned businesses, disabled-owned businesses, and LGBT-owned businesses increases our supply chain resilience and effectiveness while contributing to our local economies.

Our suppliers are expected to support these efforts by cooperating with requests related to supplier diversity, and AlixPartners will seek to work with suppliers who take steps to monitor and promote diversity within their own supply chains (but such cooperation and/or steps will always be subject to all applicable local laws in the areas where the supplier operates).

### **ANTI-DISCRIMINATION AND ANTI-HARASSMENT**

AlixPartners expects its suppliers to respect the rights of workers and to comply with all applicable laws relating to harassment, retaliation and discrimination in hiring and other employment practices. Our suppliers must ensure that all employment related decisions are based on merit alone and not on an individual's personal beliefs or characteristics including their race, color, religion, belief, age, sex, gender, gender identity, disability, sexual orientation, national origin, ethnicity, marital or family status or veteran status.

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## Environmental sustainability

Our social commitments go hand in hand with our commitments to our environment. We encourage our suppliers to join our commitment by actively fostering a culture of sustainability within their organizations, while investigating the use of environmentally friendly technologies and processes. Suppliers should measure their environmental impact, set goals and targets to improve that impact, and take action to reduce or offset negative impacts where possible.

### **SUPPLIER REQUIREMENTS**

Suppliers must comply with applicable environmental laws and regulations; suppliers should take reasonable efforts to reduce water and energy use, greenhouse gas emissions, and waste creation.

Suppliers must ensure that potential impacts to community health, and safety are appropriately considered, and steps are taken to mitigate risks and reduce impacts (such as accidents, emissions, pollution and other environmental impacts affecting health, safety, and enjoyment of use).

Working together, we can help create a **better, stronger and more resilient** business climate.

