

# Our Code of Conduct

**alight**®

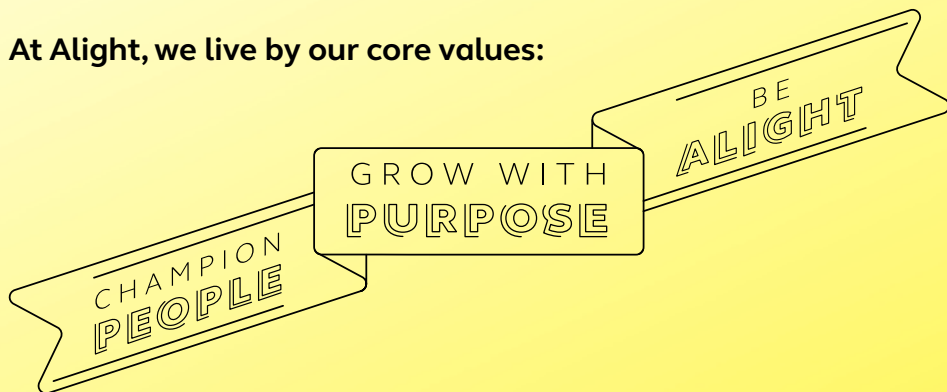
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## INTRODUCTION

# The Alight way

At Alight, we live by our core values:



To further these values, we have identified specific behaviors that drive our business decisions with integrity and set the stage for achieving our goals. These guiding behaviors enhance our values and are a critical part of this Code.

# Message from the CEO

At Alight, integrity, respect and accountability are the heart of what we do: help millions of people be healthy and financially secure. Every interaction we have with our clients, participants, partners and each other reflects our commitment to these principles and the pride we take in our work.

How we achieve success matters as much as the results themselves. The employee benefits ecosystem is inherently complex, demanding rigor and discipline to ensure compliance, safeguard the data entrusted to us and responsibly adopt evolving technology. As a market leader of benefits administration, our ethics and integrity must be beyond reproach, which is why our Code of Conduct is more than just a document—it's a commitment to how we operate every day.

Our Code of Conduct guides our decision making, upholding our values and protecting the trust placed in us. It sets clear expectations for how we work, treat people, follow the law and our policies, safeguard information and represent Alight responsibly.

Embracing the Code means taking ownership.

If you are ever unsure, ask for guidance. If you see something that doesn't feel right, speak up. When you raise a concern in good faith, you will never face retaliation. Our integrity depends on it.

Thank you for your continued commitment to honesty, transparency and always doing what's right. Together, we're strengthening our culture, earning trust and making sure we do our very best every day to build lasting success.



**Rohit Verma**, Chief Executive Officer

# Ethics and integrity in decision-making

Our Code of Conduct helps us to make ethical business decisions when conducting Alight business. However, it is not designed to address every issue. You may face a situation where the right course of action is unclear. Ask yourself the following questions when you are faced with a difficult situation and are unsure of what to do:

- Is it inconsistent with Alight’s mission and vision?
- Is it illegal?
- Is it unethical?
- Could it harm our colleagues, business partners, or clients?
- Could it harm our financial health?
- Would our organization be compromised or embarrassed if it becomes public knowledge?
- Would we be uncomfortable reading about it in the media?
- Is it unfair or inappropriate?
- Could it adversely impact our organization if everyone did it?
- Is it inconsistent with our policies or with our Code of Conduct?

If you need help deciding how to handle a particular situation at work, need to report a situation or need support in doing the right thing, the first place you should turn is your manager. If you do not feel comfortable doing so, contact the Ethics Helpline or any of the other resources listed in this Code.

It is critical that our Compliance Program is effectively communicated throughout all levels of the organization. Compliance is the responsibility of each of us and should be top of mind as we interact with colleagues, clients, business partners, and conduct our daily business activities.



# What are my obligations?

When engaged in business activity related to Alight, colleagues and partners are required to follow the rules and guidance in this Code and colleagues must certify annually that they have reviewed and understand the Code requirements.

Given that many provisions of this Code and Alight's policies are based on legal requirements, violations can subject individuals or Alight to fines, penalties and even criminal or civil sanctions. Those violations may also severely damage Alight's reputation.

## **Business or region-specific policies**

Some business units or regions may have additional compliance-related policies or procedures, referenced within the global policies, that are stricter than this Code. Always follow the stricter requirements. In all cases, colleague conduct must never fall short of the principles in our Code.

## **Leading by example: The manager's role**

Managers should serve as role models demonstrating conduct that is consistent with the Code and Alight's policies and procedures. If allegations of wrongdoing are brought to their attention, managers have an obligation to report the issue to the appropriate party.

## Who must follow the code?

**Alight's code and Alight's global policies and procedures apply to all:**

- Global Alight colleagues
- Officers and Directors
- Contractors and subcontractors as appropriate
- Any agents, affiliates, partners or third parties representing Alight

# Speaking up and reporting

## What if I see a violation?

You must take action if you are aware of or suspect people are engaging in behavior that violates this Code, Alight policies, or applicable laws. If you are aware of unethical or illegal conduct, it must be reported. You may contact:

- Your manager
- **HR Connect at HR Connect Form** for NA colleagues or your HR representative for colleagues outside of NA
- The **Alight Ethics Helpline** at Ethics Helpline
- The Legal and Compliance Department at **compliance@alight.com**

Concerns regarding potential accounting or auditing matters may also be sent directly to Alight's General Counsel, Chief Internal Auditor, or otherwise as directed in **Alight's Whistleblower Policy**. Refer to the Resources section for contact information.

Concerns regarding suspected or actual unauthorized access, disclosure, loss of or damage to data or personal information must be reported to Alight's Ethics Helpline or the Alight Response Center (ARC). Refer to the Resources section for contact information.

## Alight takes good faith allegations of improper conduct by Alight, its employees or its partners seriously and will investigate promptly.

Colleagues are expected to cooperate fully with any investigations. Interfering or providing false information in the course of an investigation is a violation of the Code.

### Cooperating with investigations

Information provided to Alight about potential violations of the law or policies will be treated confidentially to the extent permitted by law. If an investigation is needed, it will be handled by appropriate Alight personnel. When necessary, we will report conduct that appears to be criminal in nature to the appropriate authorities, and we will cooperate with any resulting investigation.

### No retaliation

Alight strictly prohibits intimidation or retaliation against anyone who makes a good faith report or who participates in an investigation.

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## Where do I go for assistance?

### **Alight's Ethics Helpline**

Alight's Ethics Helpline is a way for colleagues to seek guidance on legal or compliance matters, or to report possible violations of the Code, Alight policies, or procedures or the law.

Alight's Ethics Helpline is operated by an independent, third-party provider which maintains the confidentiality of calls. Those who contact the Ethics Helpline can remain anonymous, if they choose, where permitted by local law. Colleagues who provide their names will have their identities protected to the extent consistent with Alight's need to investigate and to take appropriate corrective action.

You will find the Helpline phone numbers for your area, along with an online reporting system in the Resources section and at: [www.alight.ethicspoint.com](http://www.alight.ethicspoint.com).

**No retaliation.** Alight strictly prohibits intimidation or retaliation against anyone who makes a good faith report or who participates in an investigation. However, if a report is made in “bad faith” — for instance, if a false or misleading report is made in a deliberate effort to get someone in trouble — the person making the report may be subject to discipline.

# Treat people right

Every Alight colleague is responsible for honoring Alight's commitment to creating a diverse, equitable, welcoming, inclusive, and safe workplace.



# Respect in the workplace

**At Alight, we have an unwavering belief that a company's success starts with its people, and our solutions connect human insights with technology. We are committed to creating a sense of belonging in the workplace, and to making Alight a place where all colleagues can feel happy and fulfilled while serving our clients and their people with excellence.**

**Alight colleagues are expected to foster and protect a culture of mutual appreciation and respect.** At Alight, we do not tolerate harassment or discrimination of any kind, including behavior that is disrespectful, abusive, or humiliating on the basis of gender, race, ethnicity, religion, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, marital, or domestic partner status or any other status protected by law.

**We believe that inclusion should be valued and maintained throughout the organization.** We create an inclusive environment that nurtures the unique background, skills and creativity that each of our colleagues brings to the organization. We provide equal treatment without regard to any

protected status or characteristic in all aspects of Alight's employment decisions, including:

- Recruitment and hiring
- Promotion and performance management
- Development and training
- Benefits and compensation
- Termination of employment

## Definitions

1. **Harassment:** Belittling or humiliating subordinates or other colleagues; bullying behavior; derogatory comments, insults, and jokes that target a certain protected status group.
2. **Sexual harassment:** When one person subjects another to unwelcome sexual advances or engages in other unwelcome sexually-related conduct (such as sharing lewd images or making lewd remarks). Creating an intimidating, hostile or offensive working environment (such as sending sexually-oriented emails at work) is also considered sexual harassment.

## Our ask of you

- 1. Always speak to and treat others in a civil, professional manner.** Colleagues must fulfill their job responsibilities and follow instructions from managers. Refusal to do so may be considered a violation of the Code. If you believe instructions you have been given are illegal or unethical, immediately report your concerns to Alight's Ethics Helpline.
- 2. Think first.** Do not communicate a joke or comment or take any action which might be viewed as threatening, offensive, derogatory, disrespectful, or insulting. What may seem funny or harmless to some people may be hurtful or degrading to others.
- 3. Don't tolerate harassment.** Colleagues should always be able to work in a respectful environment, free from behavior that creates hostile or offensive working conditions. If you experience or observe harassment or discrimination, report it immediately. Complaints of harassment or discrimination can be reported to a manager, to Human Resources or anonymously via the Ethics Helpline. Although all colleagues should report any incidents of harassment or discrimination that they witness or experience, managers and supervisors must report to HR all harassment and discrimination complaints (both formal and informal) they receive.

**Q:** What if I am unsure if the behavior I received or observed meets the definition of harassment or discrimination?

**A:** You should report the behavior to your manager, Human Resource, or the Ethics Helpline even if you are unsure if it is harassment or discrimination as we take all reports of potential misconduct seriously.

**Q:** Can I report violations anonymously?

**A:** Yes, violations can be reported anonymously using the Ethics Helpline.

### To learn more:

Please log on to [Alight Worklife®](#) located on [Spotlight for policies](#), including [Alight's Inclusion and Diversity policy](#).

# Maintaining a safe and healthy workplace

**We are committed to providing a safe and healthy work environment for all colleagues.** Alight does not tolerate workplace violence. To help maintain a safe work environment for all colleagues, no colleague may use or possess weapons, including firearms, at any time while on Alight premises or while conducting business on behalf of Alight. Unless this prohibition is contrary to state or local law, Alight premises include company parking areas and company vehicles.

Words and actions that are intimidating or threatening are also prohibited. The use of illegal drugs and alcohol and the misuse of prescribed and over-the-counter drugs in the workplace or while performing work for Alight will not be tolerated as it subjects our colleagues, clients, and visitors to unacceptable safety risks that undermine Alight's ability to operate safely, effectively, and efficiently.

## Definitions

1. Alight Premises: Unless contrary to law, this includes company parking areas and company vehicles in addition to physical workspaces.

## Our ask of you

1. Follow all applicable safety and health laws and regulations for the facility where you work.
2. Promptly report accidents, environmental concerns or dangerous situations to your manager, HR representative, Ethics Helpline or Alight's Response Center (ARC).
3. Contact your manager, HR or ARC if you witness or experience any threatened or actual violence in the workplace. Immediately contact local emergency services if you or others are facing imminent danger.

**Q:** Where can I get more information on local workplace safety policies or standards?

**A:** You can contact your manager or local HR for more information on local workplace safety policies or standards.

### To learn more:

1. [Global Workplace Violence Prevention Policy](#)
2. [Global Occupational Health and Safety Policy](#)

# Corporate Sustainability and Impact — Sustainability focus areas at Alight

## Our sustainability focus

**We aim to support the people and resources that we can affect both directly and indirectly in our roles as Alight colleagues, and as global citizens.** We act as responsible citizens in the communities in which we operate and strive to utilize resources as efficiently as possible.

Alight is committed to international employment standards and seeks to address the full spectrum of internationally recognized human rights, ranging from workplace concerns to issues affecting communities.

There shall be no use of forced labor by Alight or our partners or subcontractors. Additionally, no person shall be employed under the legal age for employment according to local laws and regulations.

### Sustainability focus areas at Alight

- 1. Employee wellbeing:** Giving our colleagues (and clients) the ability to have a healthy mind, body, wallet, and life. This may include providing a safe work environment, injury and incident transparency, promoting a work-life balance, emergency preparedness, and more.
- 2. Cyber security and privacy readiness:** Establishing systems that ensure privacy is protected including the secure use of confidential information from employees and customers.
- 3. Risk and disaster management:** Preparing for and managing potential crises and risks that may impact the business. This may include forecasting, mitigation strategies, training, critical incident management, and more.
- 4. Inclusion and impact:** Fostering a culture of nondiscrimination in which we welcome colleagues of all backgrounds and do not exclude anyone based on race, gender, religion, national origin, sexual orientation or any other protected characteristic. This may include policies that prohibit harassment and/or discrimination, recruitment and retention strategies, employee resources, inclusion and pay disclosures, and more.
- 5. Ethics:** Ensuring the company's values, standards, and norms are ethical and managed throughout business operations. These may include policies or practices relating to the Code of Conduct, anti-corruption, grievance mechanisms, compliance, levels of executive compensation, audits, and more.
- 6. Career development:** Implementing programs and policies that attract and retain talent. This may include efforts or policies that relate to employment security, compensation, incentives to pursue knowledge or skillsets, career growth opportunities, and more.

## Our ask of you

1. Support sustainability. Understand Alight's sustainability areas of focus and consider how you can contribute to or support those efforts. You can learn more about these initiatives by reading our latest Global Impact Report or visiting our [Corporate Sustainability and Impact website](#).
2. Respect human rights. Demonstrate respect for human rights begins with our daily interactions with one another and with our business partners. It includes promoting inclusion, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business. All colleagues must report any suspicion or evidence of human rights violations, whether in our operations or in those of our business partners.
3. Be proactive and look for ways to minimize Alight's environmental footprint by digitizing products, repurposing office supplies, and participating in recycling initiatives, and by using energy and water more efficiently through renewable electricity and sustainable water practices.
4. Speak up if you have ideas about how to improve the environment.

**Q:** Where can I learn more about international employment standards and human rights?

**A:** Alight's policies and practices align with several key frameworks that provide additional information. These include the following:

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights; and
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

**To learn more:**

1. [Environmental Policy](#)

# Follow the laws and our policies

**Allight colleagues are responsible for following the laws and policies that govern our work. Our Code provides guidance about some of the most important risk areas.**



# Anti-bribery laws

**Alight is committed to compliance with anti-bribery and anti-corruption laws in all countries where Alight operates.** These laws include the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, U.S. fraud statutes, state laws and similar international rules. The laws prohibit improper payments, such as bribes or promises to make improper payments, whether or not the offer is successful. Improper payments are illegal and against Alight policy, whether the conduct is engaged in by Alight colleagues or by any third party (such as a consultant, agent, lobbyist or partner) acting on Alight's behalf. **At Alight, we only do business with companies or individuals who conform to our high ethical standards.** Colleagues should select business partners carefully.

## Definitions

1. Bribe: Anything of value that is given to influence the behavior of someone in government or in the private sector with the purpose of obtaining an improper business, financial, or commercial advantage. A bribe can involve promises or payments of cash or future business, as well as gifts, travel expenses, entertainment, offers of employment and charitable contributions.
2. Government official: Anyone who works for, or is an agent of, a government-owned or government-controlled entity. This includes elected and appointed officials of national, municipal, or local governments. It also includes officials of political parties and candidates for political offices, as well as employees of a government- or a state-controlled company.

## Our ask of you

1. Do not offer, give, or accept bribes, or accept or provide any other kind of improper payment. Avoid even the appearance of making business decisions based on improper payments.
2. Never use a third party to perform an act (such as paying money or giving anything of value) that you, as a colleague, would be prohibited from engaging in directly.
3. All third parties acting on Alight's behalf in connection with Alight obtaining or retaining business must be reviewed via the Third Party Approval Process and must agree to comply with Alight's Anti-Corruption/Anti-Bribery Policy and applicable anti-bribery laws.

**Q:** Recently, I had a lunch with a former colleague who now works at a government agency. He mentioned that they are preparing to launch an RFP for selecting a new benefits administrator, and said that an internship for his newly graduated son might help 'strengthen Alight's relationship' with the agency. His son is qualified for an intern position — may I put in a good word with HR to give Alight the advantage in the RFP?

**A:** You should report the request to your manager, or another resource provided in this Code. Providing someone with employment — even an intern position — qualifies as a benefit and must not be given in order to gain a business advantage. As we must avoid even the appearance of improper influence, the consideration of the newly graduated son as an intern must be reviewed by Legal.

### To learn more:

1. [Anti-Bribery and Anti-Corruption Policy](#)
2. [Third Party Review Policy](#)

# Accepting and giving gifts and entertainment

**Gifts and entertainment should never be used to influence a decision, nor should they be considered just part of “doing business.”** Some countries where Alight operates impose restrictions on paying for or offering anything of value — such as meals, entertainment, or gifts — to business partners and, specifically, to government officials. Colleagues may give and accept business courtesies to the extent permitted by law and by Alight’s business-specific policies. Such courtesies must be within policy limits and modest enough to not interfere with ethical business judgment nor create an appearance of impropriety.

In general, the giving and acceptance of lodging and travel expenses is prohibited. Giving or accepting gifts of cash and cash equivalents (e.g., prepaid debit cards, cryptocurrency, traveler’s checks) are prohibited. More information about what is permissible, when approval is required and how to obtain it, and what is prohibited can be found in the Non-Employee Entertainment and Gifts Policy.

## Our ask of you

1. Understand and comply with the restrictions and approval requirements around providing gifts and entertainment to business partners and to government officials. This includes checking whether your business and/or geography/region has a local policy to govern gift and entertainment activity.
2. When offered a gift, obtain pre-approval for anything exceeding (\$, €, £) 150. Obtain additional pre-approval from Legal before accepting anything of value exceeding (\$, €, £) 500.
3. Record all expenses accurately in Alight's books and attach supporting documentation.
4. Never exchange gifts or entertainment to improperly influence the recipient to misuse his or her position to obtain an advantage in a bidding process.

**Q:** Alight is sponsoring a sporting event, and I have several tickets. They are great seats, and are probably expensive. I'm currently negotiating a deal with a prospective client who happens to be in town the night of the game. Can I bring the client to the game?

**A:** Gifts, including tickets to events, must be given carefully so as to avoid any appearance that we might be improperly influencing business in any way. Providing the tickets or similar items of value to a prospective client during negotiations is not permitted. However, it may be acceptable to take a current client to the game if doing so would not unduly influence the working relationship with the client.

### To learn more:

1. [Non-Employee Entertainment and Gifts Policy](#)
2. [Gift Acceptance Policy](#)

# Interactions with government officials:

## The government as a business partner

### **The government as a business partner**

Particular vigilance is required when interacting with government officials. Special legal and contracting rules apply to our dealings with governments. These include bidding or procurement requirements, stringent restrictions on gifts, travel and entertainment, special billing and accounting rules, and restrictions on subcontractors or agents. Failure to comply with these standards could result in significant and, in some cases criminal, penalties.

### **Political activity**

Alight does not currently participate in a Political Action Committee (PAC) or otherwise make any political contributions. Alight colleagues may make personal contributions to causes of their choice. Colleagues are free to participate in personal political activities, but your involvement must be on an individual basis, on your own time and at your own expense.

### **Definitions**

1. **Government Official:** Anyone who works for, or is an agent of, a government-owned or government-controlled entity. This includes elected and appointed officials of national, municipal, or local governments. It also includes officials of political parties and candidates for political offices, as well as employees of a government- or a state-controlled company (e.g., state-owned or airlines).

## Our ask of you

1. Contact Legal prior to engaging any government officials or entities as a business partner.
2. Understand and follow the restrictions around gifts and interactions with government officials.
3. Immediately notify Legal of any request made by a government official for a payment, other than legitimate taxes or fees.
4. Do not use Alight's assets or resources for political activities.
5. Never pressure others to contribute to, support, or oppose any cause, political candidate, or party, and do not solicit contributions or distribute political literature during work hours.

- Q:** I went to a fundraising dinner for a candidate for a local government office. This candidate takes positions favorable to our interests, so can I claim the dinner on my expense report?
- A:** No. If you did this, it would be considered a political contribution from Alight, which would violate our policies. While you are free to attend political fundraising events as an individual, you must not use company assets or funds, or give the impression that you are representing Alight.

### To learn more:

1. [Non-Employee Entertainment and Gifts Policy](#)

# Charitable donations

**Alight is committed to the communities in which it does business and encourages reasonable and appropriate corporate donations to charities. Donations to charitable organizations may present a risk that funds will be diverted to or benefit individual government officials or otherwise constitute bribery.**

Decisions to make corporate donations to charities or government agencies (other than those made by you in your personal capacity) will be made by leadership and consistent with company policies. These donation requests include direct grants to non-profit organizations and donations in support of charity events (e.g., fund-raising dinners, golf outings).

## Our ask of you

When proposing a charitable initiative or donation, remember that such activity by Alight must:

1. Be given only to legitimate charities.
2. Only be used for proper charitable purposes.
3. Comply with local laws, which may be more restrictive than the policy.
4. Comply with the policies applicable to the party involved.
5. Not be given to influence any regulator's or government official's decisions or actions.
6. Not be given to unethically influence a business decision.
7. Not otherwise be misapplied in violation of this policy or of local law.
8. Not be paid in cash or a cash equivalent.
9. Be properly and accurately reported in our financial books and records.

Contact Compliance for more information or questions about charitable donations.

To learn more:

1. [Charitable Donations and Sponsorships Standard](#)

# Conducting international business:

## International trade restrictions

Alight complies with U.S. trade restriction laws and regulations, including economic sanctions, applicable import/export rules and anti-boycott activities. Economic sanctions, including those set forth by the Office of Foreign Asset Control (OFAC), can limit or restrict Alight's activities with:

- Certain countries and their governments, including entities owned or controlled by such governments.
- Certain restricted persons, including individuals or entities that are considered problematic for foreign policy or national security reasons.

Alight also complies with the U.S. anti-boycott laws, which penalize U.S. companies and their non-U.S. affiliates for cooperating with or furthering international boycotts in which the U.S. does not participate (such as the Arab League Boycott against Israel). If the laws in your country prohibit complying with certain U.S. restrictions, and a transaction arises that raises a conflict between the U.S. law and your local law, you should consult with Compliance via [compliance@alight.com](mailto:compliance@alight.com).

### **Financial crime, anti-money laundering and anti-terrorism laws**

Alight complies with the financial crime, anti-money laundering and anti-terrorism laws in all jurisdictions where it does business. Alight will conduct business only with reputable parties that are engaged in legitimate business activities with funds derived from legitimate sources. Alight cannot accept funds known to be derived from illegal activities.

Persons involved in criminal activities, such as drug trafficking, corruption or terrorist activities may try to launder their funds through legitimate activities. We must be vigilant against suspicious activity.

As a regulated business, Alight Financial Services (AFS) maintains an AML program and Policy.

## Our ask of you

1. Understand and follow the law and our policies. If you are involved in international business transactions, it is especially important that you know and comply with the requirements associated with the countries in which you do business. Trade regulations are complex and dynamic; if you have any questions, contact [compliance@alight.com](mailto:compliance@alight.com).
2. Do not cooperate with unsanctioned boycotts. If you receive a request to participate in a boycott or are asked about our position on a boycott, contact [compliance@alight.com](mailto:compliance@alight.com).
3. Be alert to suspicious activities. Watch for any suspicious payments, which may include paying in cash, payments made from personal accounts instead of business accounts, and transactions with financial institutions or third parties without a logical relationship to the customer or business partner. If you encounter a situation that makes you question the legitimacy of someone with whom you are doing business, raise the issue with [compliance@alight.com](mailto:compliance@alight.com).

- Q:** A supplier has asked that we send payments to a new address outside the country of business. I am suspicious that there might be something illegal or inappropriate going on. What should I do?
- A:** You are right to be suspicious. This may be an effort to launder money or to otherwise avoid legal requirements. You should contact Legal or Compliance without delay. If possible, until you hear otherwise, do not have any further discussions with the supplier about the request.

### To learn more:

1. [Global Trade Restrictions Policy](#)

# Avoid conflicts

**At Alight, we act with integrity and avoid conflicts that may prevent us from acting in the best interest of our clients or our company.** A conflict of interest may occur when your personal interests affect your ability to make objective decisions on behalf of Alight. Colleagues may not take Alight business opportunities as their own or use Alight's property, information or position for personal gain or to compete with Alight. Additionally, colleagues must never be in the position of supervising, reviewing or having any influence on employment decisions of any close relative or a person with whom they have a close personal relationship.

## Definitions

1. A business conflict of interest may arise when Alight's interest differs from the interest of a client, prospect or business partner, or where Alight cannot act in the best interest of one client without adversely affecting another.
2. A personal conflict of interest may arise for a colleague who engages in business activities outside of Alight, has a personal interest which conflicts with Alight's or has employment-related decision authority for a colleague with whom they have a close personal relationship.

## Our ask of you

1. Recognize and avoid the risk of a conflict by taking steps to ensure that you will not make any decision, or engage in any activity, that may adversely affect Alight, Alight's relationship with a business partner or cause a conflict between you and Alight.
2. Reduce the risk of a conflict by, for example, having another colleague perform work that you should not perform because of a potential conflict.
3. Disclose an actual or potential conflict of interest to your manager and the Compliance via the **Conflict of Interest Disclosure Form**.
4. Maintain records of any actual or potential conflicts, including any mitigating action taken to address them.

**Q:** My coworker's brother just joined our business team. Is this allowed?

**A:** It may be allowed, but more information is needed. While relatives can work in the same team or operating unit, a colleague must never be in a position to hire, supervise, or influence the management of a relative.

**To learn more:**

1. **Conflict of Interest Policy**

# Fair dealing and marketing practices

We compete fairly in the marketplace, abide by fair competition and antitrust laws, and deal fairly with clients, suppliers, partners and competitors. Alight does not gain business advantages through abuse of confidential information or by means of any other unfair practice. We do not misrepresent material facts or allow our independent judgment to be compromised.

## Our ask of you

1. Never use, copy or give confidential or proprietary market information to competitors. If you happen to obtain such information about a competitor, safeguard it and contact Legal immediately.
2. Be careful when communicating or meeting with competitors. Do not:
  - Discuss fees or other aspects of Alight's pricing or compensation with competitors.
  - Discuss or agree with competitors to restrict the types of products or services offered by Alight.
  - Disclose confidential or misleading information about Alight.
  - Seek or accept inappropriate or confidential information to which Alight should not have access.

**Q:** I serve as Alight's representative with a key trade association. What am I able to discuss during our meetings and how do I know whether the discussions of others at the meeting may violate antitrust and competition laws?

**A:** While trade associations provide an excellent forum to stay informed, member meetings that bring together competitors can present antitrust risk. Before the meeting, discuss your concerns with Legal. Review the agenda to determine who might be there and what topics may come up. When you are at the meeting, stick to the agenda and limit your interaction with competitors. If the discussion turns to potentially inappropriate topics, stop the conversation, break away, and promptly inform Alight's Legal Department.

### To learn more:

1. [Anti-Trust and Fair Competition Policy](#)

# Insider trading

In the course of doing business, you may have access to inside information about Alight or a client. You must not engage in insider trading by buying or selling the securities of any company while you are aware of inside information. In addition, you may not tip or disclose inside information to anyone who might use it to make an investment decision.

## Definitions

1. **Inside information:** Any non-publicly available information that would reasonably be expected to affect the price of a security or that would influence an investor's decision. Examples of inside information include:
  - Financial results and forecasts
  - Possible mergers, acquisitions or dispositions
  - Knowledge of important product developments
  - Changes in senior management
2. **Material information:** Information for which there is a substantial likelihood that a reasonable investor would consider important in making investment decisions, information that is reasonably certain to have a substantial effect on the price of a company's securities.
3. **Non-publicly available information:** Corporate news or information that has not yet been made public and which could also have an impact on its share price. Information is "nonpublic" until it has been effectively communicated to the marketplace (e.g., through a press release and/or report made to the SEC).

## Our ask of you

1. Understand and follow the law and our policies. Never buy or sell any stocks, bonds, options, or other securities of any public company, including Alight, based on “inside information.”
2. Do not “tip” others. Never disclose material, nonpublic information about a company to someone else, including to your family or friends.
3. Use caution when discussing inside information in public, even if only speaking directly to other insiders. If others could be within earshot, then inside information can leak and cause market movement.

### To learn more:

1. [Securities Trading Policy](#)

**Q:** What if I have questions or concerns about trading?

**A:** If you have any questions about buying or selling Alight securities, you may ask the Company’s Chief Financial Officer or Legal Department.

**Q:** How do I report suspicions of insider trading?

**A:** If you suspect that a coworker or third party acting on behalf of Alight has committed, is committing, or will commit insider trading, you should report it according to the Legal Department. Every person in Alight is responsible for helping to ensure that the company complies with applicable insider-trading laws. Known or suspected violations of applicable insider-trading laws or the Alight’s Securities Trading Policy should be immediately reported to Legal.

**Q:** What are the punishment(s) for insider trading?

**A:** Insider trading is a serious offense and can include both personal financial and criminal liability. You will also be subject to corporate disciplinary action up to and including termination of your employment. You can be sued by an Alight stockholder. In addition, the U.S. Securities and Exchange Commission can sue you for a fine up to three times the profit gained or loss avoided on a trade and issue an order banning you from the securities industry. The U.S. Department of Justice can also criminally prosecute you, and you can be convicted of a felony. A felony conviction can lead to prison time, fines, and a ban from the securities industry.

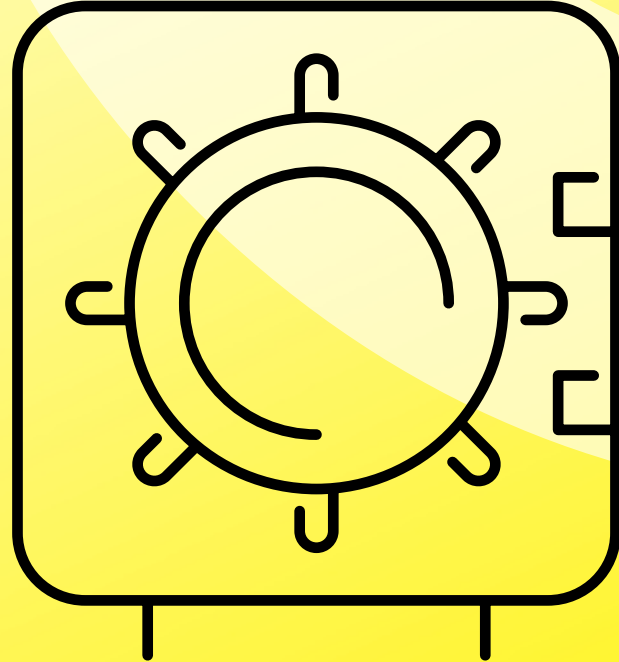
**Q:** Will Alight defend me from an inside-trading allegation?

**A:** No. You will have to pay for your own defense, which can be extremely expensive. And the damage to your reputation and Alight’s reputation can be irreparable.

# Protecting Alight and data in our care

**Through innovation, we build processes, information, and assets which we must protect.**

This includes financial assets, the Alight name, and data held or transmitted by Alight. The processes, information, and other materials colleagues create for Alight are Alight's exclusive property. Colleagues are responsible for safeguarding the information and assets under their control.



# Proper use of Alight's property

**Alight's brand is fundamental to its reputation and its business.** Further, Alight's assets are only to be used for authorized business. This includes Alight's physical (equipment, tools), informational (personal or company data), financial (funds and financial records), and electronic (devices and technology systems) assets. They are not to be used for personal purposes or in support of a non-Alight business or activity or in violation of any applicable law or regulation.

Some assets, such as telephones or computers, may be used for limited personal purposes in accordance with Alight policies, provided such use is appropriate, minimal and does not interfere with job performance.

Colleagues should be aware that they may be monitored when using Alight assets, including computers, mobile devices and email. As permitted by law, Alight reserves the right to monitor, intercept and review communications made using Alight's assets.

## Our ask of you

1. Safeguard all firm assets from loss by theft, carelessness, misuse or waste.
2. Follow Alight's expense policies. Do not engage in the falsification of records or misrepresentation when handling of assets or financial records.
3. Report suspected incidents of theft or misuse of our assets.
4. Comply with Alight's brand standards for all Alight-branded internal and external communications.
5. Protect informational assets by understanding and complying with Alight's policies on information, confidentiality, and security, discussed in the next section.

**Q:** What do I do if I leave my mobile phone or laptop on an airplane?

**A:** Contact the Alight Response Center immediately at [alightresponsecenter@alight.com](mailto:alightresponsecenter@alight.com) or one of the following numbers:  
India: 00 0800 440 2479 | US 1 866 730 1442 | All other international locations: +1 443 569 8235.

**To learn more:**

1. [Mobile Computing Standard](#)
2. [Global Acceptable Use Policy](#)

# Information confidentiality, privacy and security

**Alight is committed to protecting the personal and sensitive information it receives from business partners, clients, vendors, consultants, colleagues, and other service providers.** Alight complies with all applicable privacy and data protection laws in the jurisdictions in which Alight conducts business and follows the direction of our clients when processing their personal information, as defined in contracts. Alight policies classify information as Restricted, Confidential, Internal Use, or Public and outline processes governing the use of each type of data (see **To learn more** section on next page).

Information that identifies a person requires extra care. Alight processes personal information in accordance with the following privacy and data protection principles:

- Notice and transparency: Personal information should be processed lawfully, fairly, and transparently.
- Purpose limitation: Personal information should be processed for specific reason(s) only.
- Data minimization: Collection of personal information should be limited to what is necessary to the stated purpose of processing.

- Data quality and accuracy: Personal information should be kept confidential and secure and should be up-to-date and accurate.
- Individual rights: Individuals should have the opportunity to access and correct their personal information; and
- Storage limitation: Personal information should be processed for a limited period of time.

**Colleagues must maintain the confidentiality, privacy and security of personal data or other sensitive information about Alight, our clients and our business partners.** Colleagues may learn information about the company that is not known to the general public or to competitors. Your knowledge of such information places you in a special position of trust. Breaching that trust may expose Alight and you to civil and criminal penalties. Colleagues must access and share information with colleagues and third parties based on business need and in accordance with policies and applicable laws.

## Our ask of you

1. Never conduct Alight business using your personal email or send Alight client data, or intellectual property, or other proprietary information/ data to a personal email account.
2. Only disclose personal information to specifically authorized Alight personnel who have a need-to-know to fulfill their job responsibilities, Adhere to Alight's Global Privacy Policy in addition to the applicable local Privacy Policies.
3. Encrypt personal data and confidential data that is transmitted outside of Alight's custody.
4. Immediately report incidents involving suspected or actual unauthorized access, disclosure, alteration or loss of data or personal information by contacting Alight's Response Center (ARC) or the Ethics Helpline.
5. Never:
  - Discuss sensitive business or client information in places where others may overhear, such as in the elevator, on a bus or in a restaurant.
  - Store or transmit Alight or client data on personally-owned devices unless you are using an Alight-approved application and have confirmed the data on the device is encrypted.
  - Share your account information or use anyone else's account or a shared account to access Alight systems.
  - Record or transcribe business conversations (including those with your managers or coworkers) or store or transmit Alight or client data on personally-owned devices unless you receive pre-approval from appropriate contacts and are using an Alight-approved application and have confirmed the data on the device is encrypted.

**Q:** Due to urgency, a client contact asks me to send confidential information to the client contact's personal email account. Should I comply with the request?

**A:** Prior to complying with the request, you must verify that: (1) Sending the requested confidential information to a personal email account does not violate any security processes established by Alight or by the client; and (2) The client contact is authorized, based on job-related function, to have access to the confidential information requested. Once verified, you can send the requested information in a password-protected file through an approved secured method to the client contact.

**Q:** Is it OK if I share Alight confidential information with people I really trust, but that do not work at Alight?

**A:** No. Alight confidential information can only be shared with people who have a business need-to-know (based on job function) and are approved or authorized to have access to such information. If unsure, you should consult with your supervisor or the Alight Legal Department before sharing information with anyone.

**Q:** Can I comment on my client's confidential information with my colleagues?

**A:** Client confidential information can only be shared with people who have a need-to-know based on their job-related function. That applies to all Alight colleagues, vendors, partners, and other third parties.

### To learn more:

1. [Global Privacy Policy](#)
2. [Global Information Classification Policy](#)
3. [HIPAA Privacy Policy](#)

# Responsible use of Artificial Intelligence (AI)

**Alight is committed to the responsible, ethical, and compliant use of Artificial Intelligence (AI) Websites and AI Systems.**

## **What is AI?**

Artificial Intelligence (AI) refers to the development of computer systems that can perform tasks typically requiring human intelligence, such as understanding language, recognizing patterns, and making decisions.

## **Why do we have a specific AI policy?**

Alight recognizes that the use of AI-enabled systems can increase employee productivity and innovation. We support the use of such systems in a safe, ethical, and secure manner. At the same time, Alight recognizes that the use of AI can pose risks to our operations and customers.

## **Responsible use of AI**

Colleagues are responsible for understanding the key risks associated with use of AI, and conduct themselves thoughtfully and appropriately. Colleagues remain accountable for all decisions, actions, and work product, regardless of whether AI tools are used.

## **Key Risks of Inappropriate AI Use**

**Data Privacy Violations:** Unauthorized disclosure of personal data of Alight or its clients.

**Intellectual Property (IP) Infringement:** Unauthorized disclosure of Alight's IP or confidential information.

**Reputational Damage:** Low-quality or biased outputs without additional controls to identify and correct for them.

**Cybersecurity Threats:** Mismanaged configuration or controls that could make the system vulnerable to attacks that could lead to data breaches, manipulation or system compromise.

## Our ask of you

1. **Use sound judgment.** Treat AI as a tool, not a decision maker. Review outputs carefully and apply human judgment.
2. **Protect data and confidentiality.** Do NOT put confidential, proprietary, or sensitive information into unapproved AI tools.
3. **Make sure you obtain appropriate approvals** of each AI system from the AI Governance Board.
4. **Keep accurate records** of any AI design and usage decisions, and specifications.
5. **Know when AI is not appropriate.** AI must not be used to make final decisions in high risk or sensitive situations without appropriate human oversight.

### To learn more:

1. [Global Acceptable Use of Artificial Intelligence Policy](#)

# Accuracy and retention of business records

**Compliance with records management practices supports efficient business operations, preservation of corporate memory, and compliance with relevant legal and regulatory requirements.** The Alight Global Records Management Policy establishes Alight's rules regarding records management processes across Alight. This includes the creation, storage, access, use, and secure disposal of corporate information, including, but not limited to, business records.

All colleagues are responsible for ensuring that business records are properly identified, retained, protected and disposed of in accordance with legal requirements and Alight's Global Records Management Policy and associated standards.

## Our ask of you

1. Retain and protect business records for the applicable record-retention period.
2. Preserve and protect business records as directed by the Legal Department in connection with a litigation or investigation.
3. Properly and promptly dispose of business records for which retention is no longer necessary for legal or business reasons and not otherwise required under Alight policy.

**Q:** I was provided a new Alight work laptop. My previous laptop has business-related information and communication from the last few years. Do I need to do anything to preserve this data, or can I send the old computer to be wiped?

**A:** This information might need to be preserved, depending on what it is. Check the Policy or consult with your local legal contact if you aren't sure whether the data should be preserved.

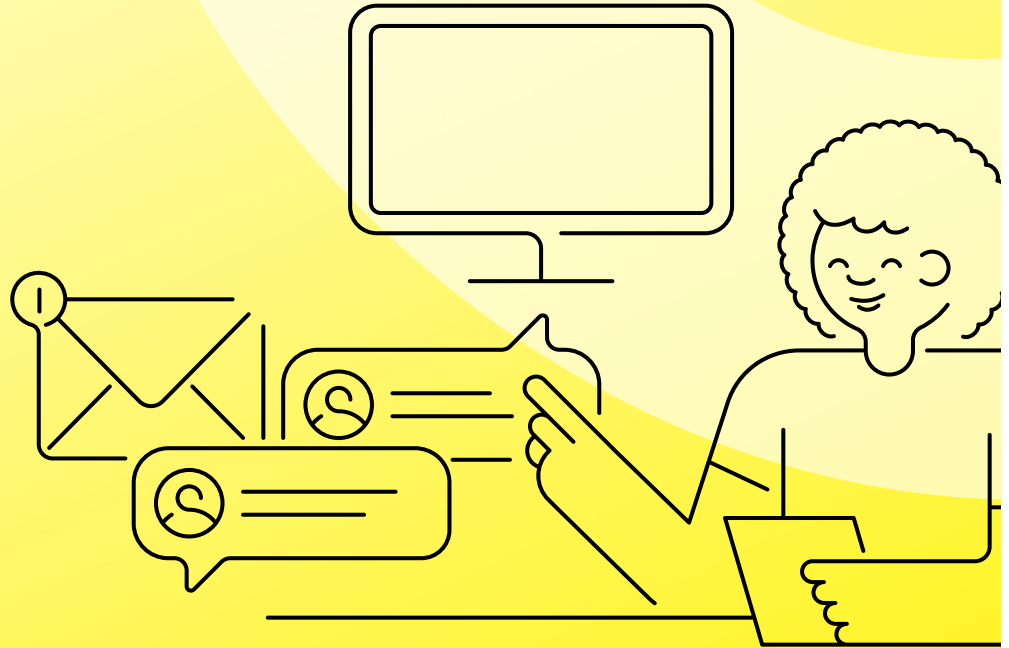
### To learn more:

1. [Global Business Records Retention Policy](#)

# Represent Alight responsibly

**We work diligently to build and to maintain Alight's reputation for honesty and integrity.**

The Code provides guidance for communicating outside of Alight so that we speak with one clear and professional voice consistent with our values and policies.



# Media contact

**We must accurately and clearly represent Alight in the media in all circumstances to protect our company and our brand.** To make this possible, only those colleagues expressly authorized to represent Alight are allowed to communicate on Alight's behalf.

**Alight requires a member of Alight's Public Relations team to serve as the main point-of-contact with the media.** All media requests should be forwarded to Corporate Communications.

## **Social Media**

Alight recognizes that social media can be a useful means of marketing, enhancing business relationships, and promoting our culture, brand and thought leadership. Colleagues must apply thoughtful rationale to their social media posts, following the Code of Conduct and Alight's Global/ Social Media Policy and Participation Guidelines.

Colleagues identifying themselves as Alight employees on personal social media must remember that any statements they make on social media reflect the Alight brand. If you are discussing Alight or our services, be clear about who you are, your relationship to Alight, and that you are expressing your personal opinion. Failure to properly adhere to Alight values, policies and legal requirements may adversely affect your employment, assignment, or contract, as applicable. Use your best judgment before posting or sending something online.

Liking, sharing and re-posting approved Alight content is encouraged.

## Our ask of you

1. Do not communicate on behalf of Alight unless you have been expressly authorized to do so by Alight's PR or Corporate Communications team. If you are contacted by a member of the media, please forward the request, or alert Corporate Communications.
2. Protect all sensitive and proprietary information from unauthorized access, use or disclosure. Our commitment to protecting sensitive and confidential information regarding Alight, our customers, our workforce members, our business partners and others applies online. Never post content or a photo containing confidential company information without approval.
3. Do not post client and partner logos via social media personal profiles, as an Alight employee, without prior client/Legal approval.

**Q:** Can I post photos of our Alight office holiday party on my personal social media account?

**A:** Yes, however, it is important to review the photo closely to ensure there is no confidential information displayed in the photo (e.g., information on a whiteboard or confidential documents on a desk in the background).

**Q:** Can I identify myself as an Alight colleague on my personal (non-professional) social media accounts?

**A:** Yes, however, you must disclaim that views and opinions are your own.

### To learn more:

1. [Social Media Policy and Participation Guidelines](#)

# Corporate authority

**Only make commitments you are authorized to make.** Business units have guidelines that outline the authority of colleagues to make commitments (e.g., entering into contracts) on Alight's behalf. If you are unsure who can make commitments on behalf of Alight, contact Legal.

## **Lawsuits, Claims and Government Inquiries**

Legal is responsible for managing Alight's liability risks, litigation and claims. Legal is solely responsible for hiring outside lawyers for Alight work and for coordinating responses to requests for information from government agencies or in connection with legal matters.

# Our ask of you

1. Contact Legal if you receive a request for information from a government official, administrative agency, court or a non-government or private party such as subpoenas requesting documents or testimony, letters or calls from attorneys or any other non-routine request for information.
2. Contact Legal if you are notified of any lawsuit, arbitration or other adversarial proceeding involving Alight or any of Alight's affiliates or subsidiaries.
3. Report any claims or incidents which might give rise to a claim to Legal through established reporting procedures.
4. Never alter, falsify, or conceal records or documents relevant to legal matters including litigation, arbitration, any adversarial proceeding or investigation.

# The Code and you

**The Code is not a contract of employment and does not create any contractual rights between Alight and any person. The Code sets the minimum standards of behavior required when acting on Alight's behalf.**



# Permitted conduct

Nothing contained in this Code limits an employee's ability to file a charge or complaint with the:

- Equal Employment Opportunity Commission
- National Labor Relations Board
- Occupational Safety and Health Administration (OSHA)
- Any other federal, state or local governmental agency or commission

Further, nothing in this Code or in any other company policy or agreement you may have with the company limits an employee's ability to communicate as an individual citizen with any government agency or otherwise participate in any investigation or proceeding that may be conducted by any government agency, provided that such communications are consistent with applicable law and that an employee does not disclose Alight information that is protected by the attorney-client privilege, except as expressly authorized by law. This Code does not limit an employee's right to receive an award for information provided to any government agency.

## **Defend Trade Secrets Act**

Pursuant to the Defend Trade Secrets Act, an individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (1) is made (i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (2) is made in a complaint or other document filed in a lawsuit or other proceeding if such filing is made under seal.

## **Enforcement**

Failure to live up to the responsibilities in this Code will result in disciplinary action up to and including termination of employment, subject to local laws.

If you need help deciding how to handle a particular situation at work, need to report a situation or need support in doing the right thing, the first place you should turn is your manager. If you do not feel comfortable doing so, contact the Ethics Helpline or any of the other resources listed in this Code.

# Policy links

1. [Anti-Bribery and Anti-Corruption Policy](#)
2. [Anti-Trust and Fair Competition Policy](#)
3. [Conflict of Interest Policy](#)
4. [Environmental Policy](#)
5. [Gift Acceptance Policy](#)
6. [Global Acceptable Use Policy](#)
7. [Global Information Classification Policy](#)
8. [Global Occupational Health and Safety Policy](#)
9. [Global Privacy Policy](#)
10. [Global Acceptable Use of Artificial Intelligence Policy](#)
11. [Global Business Records Retention Policy](#)
12. [Charitable Donations and Sponsorships Standard](#)
13. [Global Trade Restrictions Policy](#)
14. [Global Workplace Violence Prevention Policy](#)
15. [HIPAA Privacy Policy](#)
16. [Inclusion and Diversity Policy](#)
17. [Mobile Computing Standard](#)
18. [Non-Employee Entertainment and Gifts Policy](#)
19. [Securities Trading Policy](#)
20. [Social Media Policy and Participation Guidelines](#)
21. [Third Party Review Policy](#)
22. [Whistleblower Policy](#)

Log on to Alight Worklife® located on Spotlight to search for policies.

# Resources

## Alight Ethics Helpline

- Australia/Germany/Singapore: 001-844-570-4239.
- Canada: From an outside line dial the ITFS number for your location: 844-570-4239.
- India: From an outside line dial the direct access number for your location: 000-117; at the English prompt dial 844-570-4239.
- Philippines: From an outside line dial the direct access number for your location: Philippines (PLDT - Tagalog Operator) 1010-5511-00; Philippines (Globe, Philcom, Digitel, Smart) 105-11; at the English prompt dial 844-570-4239.
- Poland: From an outside line dial the direct access number for your location: Philippines (PLDT - Tagalog Operator) 1010-5511-00; Philippines (Globe, Philcom, Digitel, Smart) 105-11; at the English prompt dial 844-570-4239.

- Puerto Rico: From an outside line dial direct for your location: 1- 844-570-4239.
- United Kingdom: From an outside line dial the ITFS number for your location: 0808-234-9132.
- United States: From an outside line dial direct for your location: 1- 844-570-4239.
- Website: <https://secure.ethicspoint.com/domain/media/en/gui/51067/index.html>

## Alight Response Center

- [alightresponsecenter@alight.com](mailto:alightresponsecenter@alight.com)
- India: 00-0800-440-2479
- US: 1-866-730-1442
- All other international locations: +1-443-569-8235

## Communications

- [internalcommunicationsmailbox@alight.com](mailto:internalcommunicationsmailbox@alight.com)

## Compliance

- [compliance@alight.com](mailto:compliance@alight.com)

## HR Connect (Connect Canada, US, Puerto Rico)

- [https://newco.ethicspointvp.com/custom/newco/forms/hrc2/form\\_data.asp](https://newco.ethicspointvp.com/custom/newco/forms/hrc2/form_data.asp)

## Legal

- [legalrequests@alight.com](mailto:legalrequests@alight.com)

## Policies

- Alight Worklife® located on Spotlight

**No retaliation.** Alight strictly prohibits intimidation or retaliation against anyone who makes a good-faith report or who participates in an investigation.

# About Alight

Alight is a leading cloud-based human capital technology and services provider that powers confident health, wealth and wellbeing decisions for 36 million people and dependents. Our Alight Worklife® platform combines data and analytics with a simple, seamless user experience. Supported by our global delivery capabilities, Alight Worklife is transforming the employee experience for people around the world. With personalized, data-driven health, wealth, pay and wellbeing insights, Alight brings people the security of better outcomes and peace of mind throughout life's big moments and most important decisions. Learn how Alight unlocks growth for organizations of all sizes at [alight.com](https://alight.com).