

alight

Our Code of Conduct

January 2021

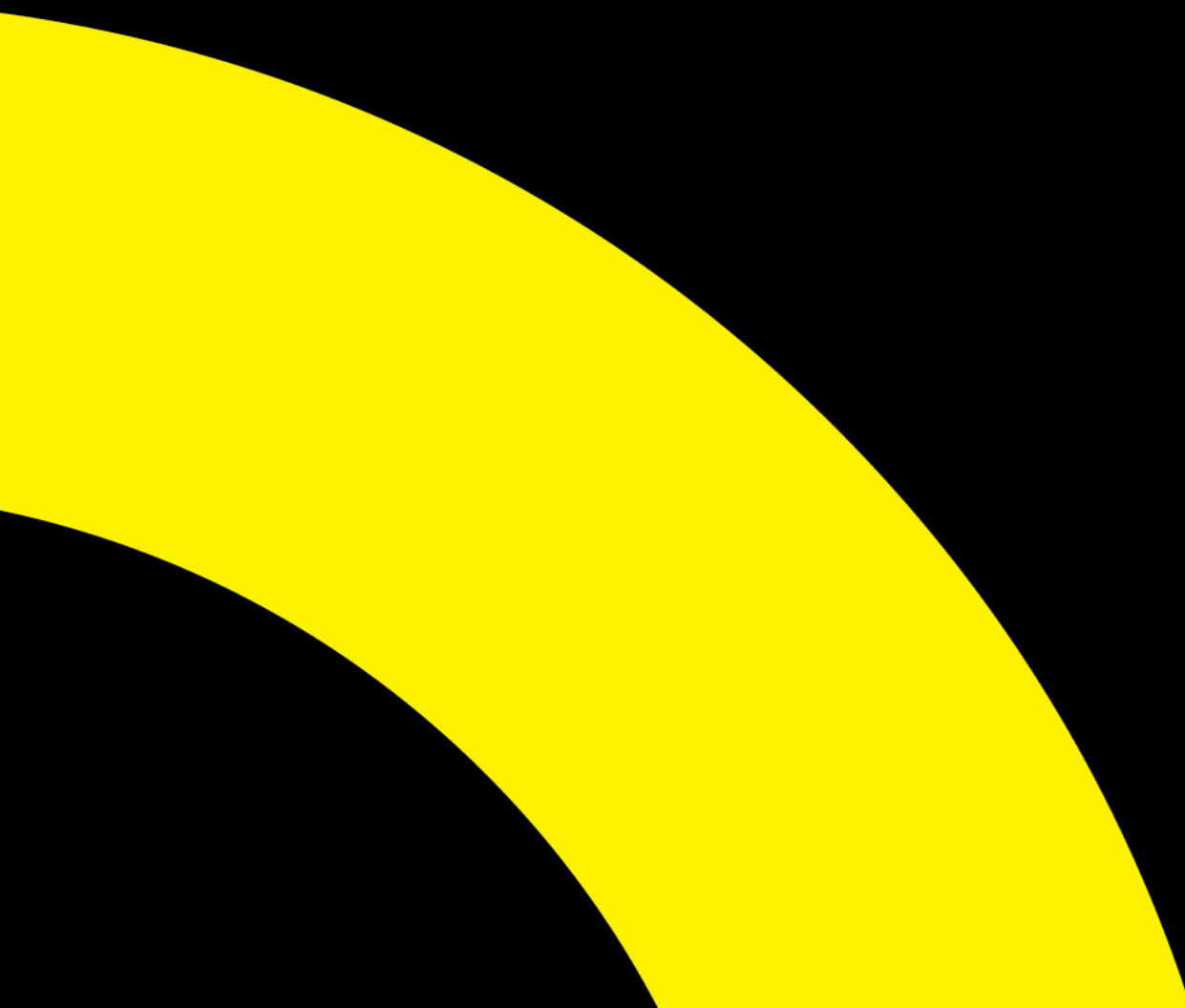


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The Alight way

At Alight, we live by our core values:

People matter | Excellence every day | Think forward | Act now | Be real

We act with high ethical standards and follow all applicable laws, regulations and company policies.



Treat people right
Follow the laws and our policies
Protect Alight and data in our care
Represent Alight responsibly

Message from the CEO

Alight colleagues,

Building on a quarter century of expertise and experience, we've established Alight as a unique, vibrant and customer-centric brand, focused on delivering value for our clients and their people. From the beginning, our purpose and values have set the tone for our culture, our commitment to innovation and our growth trajectory as a leading provider of technology-enabled HR and financial solutions.

As we focus on living up to the promise of our purpose and bringing our values to life, we must continue acting with integrity, honesty and transparency. Through every action and interaction with one another and with our clients, we must hold ourselves accountable. Alight is a trusted partner to thousands of organizations — each one expects us to bring the best of Alight every day and do all that we can to help their people thrive.

By being your best self and living our values, you make it easy for us to collaborate, innovate and move forward together as One Alight. Our Code of Conduct offers the framework for how each of us strengthens and upholds that reputation every day.

At Alight, we always do our best ... and we always do what's right.

A handwritten signature in black ink that reads "Stephen". The signature is written in a cursive, flowing style with a long horizontal tail stroke extending to the right.

Who must follow the Code?

Alight's Code and Alight's global policies and procedures apply to all:

- Employees
- Officers and directors
- Contractors and subcontractors as appropriate
- Any agents, affiliates, partners or third parties representing Alight

Business or region-specific policies

Some business units or regions may have additional policies or procedures 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.

What are my obligations?

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.

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.

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.

What if I see a violation?

You must take action if you see people acting unethically or illegally. If you are aware of any violations of this Code, Alight policies or procedures or the law, you should report them. You may contact:

- Your manager
- HR Connect at HR [Connect Form](#) or your HR representative
- The Alight Ethics Helpline at [Ethics Helpline](#)
- The Legal Department

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.

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

Where do I go for assistance?

Alight's Ethics Helpline

Alight's Ethics Helpline is a way for colleagues to seek guidance on legal compliance matters or 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 take appropriate corrective action. You will find the Helpline phone numbers for your area, along with an online reporting system at: www.alight.ethicspoint.com.

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.

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, welcoming and safe workplace.

Harassment and discrimination

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.

Types of harassment

Sexual harassment occurs when one person subjects another to unwelcome sexual advances or engages in other unwelcome sexual conduct. Creating an intimidating, hostile or offensive working environment (such as sending sexually-oriented emails at work) is also considered sexual harassment. Other forms of harassment and discrimination include:

- Belittling or humiliating subordinates or other colleagues
- Bullying behavior
- Derogatory comments, insults and jokes that target a certain protected status group

Think first

What may seem funny or harmless to some people may be hurtful or degrading to others. Consider how others could perceive your words and actions. Always speak to and treat others in a civil, professional manner. Think ahead of time and do not communicate a joke or comment or take an action which might be viewed as threatening, hurtful, offensive, derogatory or insulting.

Diversity and equal treatment

At Alight we believe that diversity should be valued and sustained 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
- Development and training
- Benefits and compensation
- Termination of employment

Reporting harassment and discrimination

Complaints of harassment or discrimination can be reported to a manager, to Human Resources or 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.

Maintaining a safe and healthy workplace

We are committed to providing a safe and healthy environment for all colleagues.

Everyone must follow all applicable safety and health laws and regulations for the facility where they work. Colleagues must promptly report accidents, environmental concerns or dangerous situations to their manager, HR representative, Ethics Helpline or the Alight Resource Center.

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. Contact your manager, HR or the 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.

The use of illegal drugs and alcohol and misuse of prescribed and over-the-counter drugs will not be tolerated as it subjects our employees, clients and visitors to unacceptable safety risks that undermine Alight's ability to operate safely, effectively and efficiently.

Follow the laws and our policies

Alight 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-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 and kickbacks, or promises to make improper payments, whether or not the offer is successful.

- Bribes and kickbacks can involve promises or payments of cash or future business, as well as gifts, travel expenses, entertainment, offers of employment and charitable contributions.
- 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.

For more information, please see Alight's Anti-Corruption Policy or contact the Legal Department with any concerns about potential payments in connection with your activities for Alight.

Business partners and third parties

At Alight, we only do business with companies or individuals who conform to our high ethical standards. Colleagues should select business partners carefully.

As a general rule:

- Never do business with a third party in circumstances that may reflect poorly on Alight's reputation.
- 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.

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 Policy and applicable anti-bribery laws.

Accepting and giving gifts and entertainment

Colleagues may give and accept business courtesies to the extent permitted by law and 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. Please refer to Alight's Non-Employee Entertainment and Gifts Policy and Alight's Gift Acceptance Policy for more details.

Bringing our Code to life: Charitable contributions

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 contribution requests include direct grants to non-profit organizations and donations in support of charity events (e.g., fund-raising dinners, golf outings).

Interactions with government officials

Particular vigilance is required when interacting with government officials. Please see the Non-Employee Entertainment and Gifts Policy for details. Giving anything of value above the policy limit to a government official or a government-owned entity is generally prohibited without approval. The term “government official” is used broadly in many anti-bribery laws. It includes:

- Persons employed by state-owned enterprises, such as state-owned or controlled insurance companies, banks, oil companies or airlines.
- Persons acting (or purporting to act) on behalf of government agencies and departments and non-governmental international organizations.
- Political parties and party officials.
- Candidates for political office.

Consult the Legal Department if you are unsure whether someone should be considered a government official.

Political donations

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.

Bringing our Code to life: Political activity

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.

- You may not use Alight’s social media to promote personal opinions or make any reference to Alight related to your political social media remarks.
- It is not permitted to use Alight’s assets or resources for political activities.

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 the Legal Department. Please review Alight's Global Trade Restrictions Policy for more information about these laws.

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. If you encounter a situation that makes you question the legitimacy of someone with whom you are doing business, raise the issue with the Legal Department.

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 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.
- 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.

In the workplace, colleagues must:

- Recognize and address potential conflicts and manage actual conflicts of interest that arise.
- Avoid doing anything that could create the appearance of failing to act in the best interest of our clients or business partners.

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 romantic and/or close personal relationship. Additionally, 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.

Please refer to Alight's Business Conflicts of Interest Policy and Personal Conflicts of Interest Policy for additional information regarding how to identify, manage and report potential conflicts.

Bringing our Code to life: 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.

Inside information is 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

Fair dealing and marketing practices

We 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.

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 the Legal Department immediately.

We compete fairly in the marketplace and abide by fair competition and antitrust laws. Colleagues should never:

- 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.

For more detailed guidance on this topic, read Alight's Fair Competition/Antitrust Policy.

Labor laws

Alight is committed to international employment standards. 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.

Protect 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.

Alight's brand is fundamental to its reputation and its business. Alight-branded internal and external communications must comply with Alight's brand standards. For more information, contact the Marketing Department.

Proper use of Alight's property

Colleagues must comply with Alight's expense policies and safeguard all firm assets from loss by theft, carelessness, misuse or waste.

Alight's assets are only to be used for authorized business. 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.

Information confidentiality, privacy and security

Colleagues must maintain the confidentiality and security of personal or sensitive information about Alight, our clients and our business partners.

Confidential information includes:

- Information about Alight that is not known to the general public or that is restricted internally including details about pricing, financial performance or business plans.
- Non-public information that relates to third parties with whom Alight has a confidentiality obligation, such as its clients and vendors.
- Non-public information about individuals including payroll, health or medical information and any information which would be classified as "personal data" of an individual by privacy laws.

Your knowledge of confidential information places you in a special position of trust. Breaching that trust may expose Alight and you to civil and criminal penalties.

Never conduct Alight business using your personal email or send Alight client data or intellectual property to a personal email account.

Information privacy

Alight's commitment to integrity extends to personal information from our clients, colleagues, business partners, suppliers or any other party whose personal data is processed or controlled by Alight.

Alight may collect and process personal information and may use and share that data in our internal systems and on behalf of our clients. Colleagues should only disclose personal information to specifically authorized Alight personnel who have a need-to-know to fulfill their job responsibilities, in line with our obligations under applicable laws (concerning Alight's own data as well as the data of our clients) and contractual obligations to our clients to keep their data confidential and secure, and to service providers who have a need-to-know to fulfill their business obligations to Alight and who are under contractual obligations to keep the data secure, confidential and in accordance with applicable privacy laws.

Alight may share authorized data among its affiliated businesses. Due to the global nature of Alight's operations, Alight may transmit, store and otherwise process data outside the country where it was collected. Alight is committed to handling such data responsibly, and complies with applicable laws and regulations of jurisdictions from which the personal data is collected and in which it is processed, used or stored. Every colleague is responsible for privacy compliance and must adhere to Alight's Global Privacy Policy in addition to the applicable local Privacy Policies. Alight will regularly train and educate all colleagues in adequate data privacy and protection of personal and sensitive information.

Information security

At Alight, we protect and secure confidential information, whether it relates to Alight or our clients. Colleagues must access and share information with colleagues and third parties based on business need and in accordance with policies and applicable laws. Colleagues are also required to encrypt confidential data that is transmitted outside of Alight's custody.

It is never permissible to:

- Discuss confidential 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 have received Alight's approval 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.

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. Alight's information security policies and procedures include additional requirements for safeguarding information and information systems.

Accuracy and retention of 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 Information Governance Policy and associated standards.

These obligations include:

- Retaining and protecting business records for the applicable record-retention period.
- Preserving and protecting business records as directed by the Legal Department in connection with a litigation or investigation.
- Properly and promptly disposing of business records for which retention is no longer necessary for legal or business reasons and not otherwise required under Alight policy.

Represent Alight responsibly

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.

Media contact

Alight requires a member of Alight's PR team to serve as the main point-of-contact with the media. All media requests should be forwarded to Corporate Communications. Please see Alight's Media Policy for more information.

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. Never post content or a photo containing confidential or personal information without approval. Liking, sharing and re-posting approved Alight content is encouraged.

Subpoenas and government inquiries

Due to the nature of our business, we often receive requests for information from government agencies or in connection with legal matters. Contact the Legal Department 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.

It is Alight's responsibility to maintain accurate and complete records. Records or documents relevant to legal matters including litigation, arbitration, any adversarial proceeding or investigation must never be altered, falsified or concealed. Documents (including electronic data) relating to pending legal matters must be retained and cannot be destroyed without the approval of the Legal Department.

Lawsuits and claims

The Legal Department is responsible for managing Alight's liability risks, litigation and claims and for providing legal services to Alight.

The Legal Department is solely responsible for hiring outside lawyers for Alight work. Contact the Legal Department if you are notified of any lawsuit, arbitration or adversarial proceeding involving Alight or any affiliates or subsidiaries. Report any claims or incidents which might give rise to a claim to the Legal Department through established reporting procedures.

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 the Legal Department.

Professional behavior

At Alight, we are committed to integrity and professionalism. Colleagues must fulfill their job responsibilities and follow instructions from managers. Refusal to do so is considered a breach of appropriate business conduct. If you believe instructions you have been given are illegal or unethical, immediately report your concerns to Alight's Ethics Helpline.

As colleagues we share our work environment. Alight expects that colleagues will maintain a professional workspace, demeanor and appearance consistent with our dress guidelines and other applicable policies. Colleagues are also expected to treat each other with respect. Inappropriate or bullying behavior will not be tolerated.

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 link library:

[Anti-Bribery/Anti-Corruption Policy](#)

[Insider Trading Policy Third Party Review Policy Gift Acceptance Policy](#)

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

[Global Trade Restrictions Policy](#)

[Anti-Money Laundering Policy](#)

[Charitable Gifting and Sponsorships Policy](#)

[Conflict of Interest Policy Antitrust /Fair Competition Policy Global Privacy Policy](#)

[Global Information Governance Policy](#)

[Alight Social Media Policy and Participation Guidelines](#)

About Alight

With an unwavering belief that a company's success starts with its people, Alight Solutions is a leading cloud-based provider of integrated digital human capital and business solutions. Leveraging proprietary AI and data analytics, Alight optimizes business process as a service (BPaaS) to deliver superior outcomes for employees and employers across a comprehensive portfolio of services. Alight allows employees to enrich their health, wealth and work while enabling global organizations to achieve a high-performance culture. Alight's 15,000 dedicated colleagues serve more than 30 million employees and family members. Learn how Alight helps organizations of all sizes, including over 70% of the Fortune 100 at alight.com.

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