

ALIGHT, INC.

WHISTLEBLOWER POLICY

The Audit Committee of the Board of Directors of Alight, Inc. (together with its subsidiaries, the “Company”) has established the following procedures for the receipt, retention, investigation and treatment of complaints and concerns regarding accounting, internal accounting controls, and auditing regarding the Company and its subsidiaries. The receipt, retention, investigation and treatment of all other complaints and concerns regarding legal and regulatory matters will be overseen by the Legal Department and handled pursuant to the Company’s Code of Conduct and related policies, procedures and investigation guidelines.

A. Scope of Matters Covered by the Policy

1. The procedures set forth in this policy relate to complaints and concerns of employees and other interested parties, including investors, (each referred to in this policy as a “Complainant”) of the Company and its subsidiaries (“Reports”) regarding accounting, internal accounting controls or auditing matters (an “Accounting Allegation”), including, without limitation:

- a. fraud or deliberate error in the preparation, review or audit of financial statements of the Company;
- b. fraud or deliberate error in the recording and maintaining of the Company’s financial records;
- c. deficiencies in, or non-compliance with, the Company’s internal controls over financial reporting;
- d. misrepresentation or false statements regarding a matter contained in the Company’s financial records, financial statements, audit reports or any related financial materials provided to the Company’s investors or debtholders;
- e. deviation from full and fair reporting of the Company’s financial condition and results;
- f. substantial variation in the Company’s financial reporting methodology from prior practice or from generally accepted accounting principles without adequate public disclosure;
- g. issues affecting the independence of the Company’s independent registered public accounting firm;
- h. falsification, concealment or inappropriate destruction of corporate or financial records; or
- i. theft, fraud or other misappropriation of Company assets;

2. In the discretion of the Audit Committee, certain responsibilities of the Audit Committee created by these procedures may be delegated to the chairperson of the Audit Committee, to a subcommittee of the Audit Committee, to the General Counsel or to the Legal Department.

B. Procedures for Making Complaints

1. In addition to any other avenue available, any employee may, in his or her sole discretion, report to the Audit Committee, General Counsel or the head of internal audit (the “Chief Internal Auditor”), or the Legal Department, openly, or confidentially and/or anonymously, any Accounting Allegation in the following manner:

- a. sending an e-mail to the General Counsel or Chief Internal Auditor;
- b. submitting an electronic notice through Alight’s Ethics Helpline at www.alight.ethicspoint.com; or
- c. calling the regional phone number available via Alight’s Ethics Helpline at www.alight.ethicspoint.com.

2. Any other interested party may report a complaint to the Audit Committee, General Counsel, Chief Internal Auditor any Accounting Allegation as set forth in Section B.1. above. Any such Report must be accompanied by the name of the person submitting the Report.

3. The Reports should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper assessment. In addition, all Reports should contain sufficient corroborating information to support the commencement of an investigation. For example, the names of individuals suspected of violations, the relevant facts of the violations, how the Complainant became aware of the violations, any steps previously taken by the Complainant, who may be harmed or affected by the violations, and, to the extent possible, an estimate of the misreporting or losses to the Company as a result of the violations.

4. The Alight Ethics Helpline is staffed by an outside, independent service provider and allows any employee or other interested party of the Company and its subsidiaries to make a Report. Employees are able to submit a Report on an anonymous and confidential basis and are not required to divulge their name.

5. The Alight Ethics Helpline (telephone & website) provider will explain to each caller procedures for following up on the Report (including how the caller can or may be asked to provide additional information at a later date).

C. Treatment of Reports Received by the General Counsel or the Chief Internal Auditor

1. The General Counsel and Chief Internal Auditor should, upon receipt of a Report and when possible and appropriate, acknowledge receipt to the Complainant who submitted it. If the Report is received by the Chief Internal Auditor, the General Counsel shall be promptly notified, unless the General Counsel is a subject of the Report.

2. All Reports sent to the General Counsel or the Chief Internal Auditor will be reviewed and managed by the General Counsel or his or her designee.
 - a. The General Counsel will promptly forward to the Audit Committee any Report involving a Named Executive Officer or having an actual or potential misreporting or loss to the Company that could have a material adverse effect on the Company's reputation or financial statements; and
 - b. The General Counsel will promptly determine whether to commence an investigation of all other Reports:
 - i. The General Counsel may, in his/her reasonable discretion, determine not to commence an investigation if the Report contains only unspecified or broad allegations of wrongdoing without appropriate informational support or if the Report is not credible. This decision and the reasons for this decision will be recorded in Alight's then current investigation system of record and reported in summary format to the Audit Committee at its next ordinary meeting.
 - ii. If the General Counsel determines that an investigation must be conducted, the Legal Department will promptly commence the investigation. The General Counsel shall also promptly investigate other Reports as requested by the Audit Committee and report the findings of the investigations conducted pursuant to this Section to the Audit Committee.
 - iii. The General Counsel or his or her designee in the Legal Department may consult with any member of management who is not the subject of the Accounting Allegation included in the Report and who may have appropriate expertise to provide assistance in connection with the investigation of the Report. The General Counsel may also engage independent accountants, counsel or other experts to assist in the investigation of Reports and analysis of results, if necessary or appropriate.
 - iv. The General Counsel or his or her designee in the Legal Department shall, at every Audit Committee's ordinary meeting, present a summary of all the Reports received by the Legal Department and processed pursuant to the Company's Legal investigation practices and procedures unless prevented by confidentiality or privilege.

D. Treatment of Reports Received by, or Forwarded to, the Audit Committee

1. The Audit Committee should, upon receipt of a Report directly from a Complainant and when possible and appropriate, acknowledge, or direct the General Counsel, to acknowledge, receipt of the Report to the Complainant who submitted it.
2. All Reports received directly by the Audit Committee or pursuant to Section C.2.a. above must promptly undergo a review by the Audit Committee. In addition, it is expected

that the Audit Committee will promptly notify the General Counsel of any reports directly received by the Audit Committee, unless the General Counsel is a subject of the Report:

- a. The Audit Committee, in consultation with the General Counsel where applicable, may determine not to commence an investigation if a Report contains only unspecified or broad allegations of wrongdoing without appropriate informational support or the Report is not credible. This decision may, to the extent appropriate, be made known to the Complainant who submitted the Report.
- b. If the Audit Committee, in consultation with the General Counsel where applicable, determines that an investigation should be conducted, the Audit Committee, in consultation with the General Counsel where applicable, shall determine an appropriate investigation plan taking into account, among other factors that are appropriate under the circumstances, the following:
 - i. Who is the alleged wrongdoer?
 - ii. How material is the misreporting or loss?
 - iii. How serious is the alleged wrongdoing?
 - iv. How credible is the allegation of wrongdoing?

3. If the Audit Committee, in consultation with the General Counsel where applicable, determines that the Legal Department should investigate the Report, the General Counsel shall thereafter promptly investigate the Report and shall report the results of the investigation to the Audit Committee. The General Counsel shall participate in all such investigations, unless the General Counsel is a subject of such investigation in which case the Audit Committee will investigate the Report.

4. If the Audit Committee conducts the investigation, it may consult with any member of management who is not the subject of the Accounting Allegation included in the Report and who may have appropriate expertise to provide assistance. The Audit Committee may also engage independent accountants, counsel or other experts to assist in the investigation of Reports and analysis of results.

E. Results of Investigation

1. Upon completion of the investigation of a Report, the Audit Committee or the General Counsel will take, or will direct the taking of, such prompt and appropriate corrective action, if any, as in its/his/her judgment is deemed warranted, including, if applicable, referral for criminal prosecution. The Audit Committee or the General Counsel may contact, to the extent appropriate, each Complainant who files a Report to inform him or her of the results of the investigation and what, if any, corrective action was taken.

2. No action will be taken against any Complainant who makes a Report in good faith, even if the facts alleged are not confirmed by subsequent investigation. However, if, after investigation, a Report is found to be without substance and to have been made for malicious or

frivolous reasons, the employee who made the Report could be subject to disciplinary action, up to, and including, termination of employment.

F. Communication to Employees and Other Interested Parties

1. The Company will disclose to employees in Company's Code of Conduct and in other communications that employees may, in their discretion, report openly or confidentially and/or anonymously, an Accounting Allegation in the manner set forth in Sections B.1. and B.2

G. Protection of Whistleblowers

1. Neither the Company, the Audit Committee nor any director, officer, employee, contractor, subcontractor or agent of the Company will discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate, directly or indirectly, against any person who, in good faith, makes a Report to or otherwise assists the Audit Committee, management or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a Report. These prohibitions also apply to the Company's subsidiaries and affiliates whose financial information is included in the consolidated financial statements of the Company.

2. Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, neither the Company, the Audit Committee nor any director, officer or employee of the Company shall (i) reveal the identity of any person who makes a Report and asks that his or her identity remain confidential, or (ii) make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a Report anonymously.

3. This policy is intended to create an environment where employees can act without fear of reprisal or retaliation. Any employee who is found to have engaged in retaliation against any employee who has exercised his or her rights under this policy or under applicable laws will be subject to appropriate remedial action, including possible termination. In addition, those individuals who violate applicable law may also be subject to civil and criminal penalties.

H. Records

1. The General Counsel shall maintain a log of all records relating to any Reports of Accounting Allegations, tracking their receipt, investigation and resolution and the response to the person making the Report. The Company shall retain copies of the reports and the General Counsel's log for a period of seven years, unless notified by the General Counsel of an extended retention period.

Effective Date: July 2, 2021