

Pearson Ham Group Code of Conduct Policy

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Introduction

At Pearson Ham Group, our mission is to help our clients achieve value through better pricing. To achieve that, we strive to develop exceptional consulting and pricing talent.

Our values drive all that we do and are shared by all of our employees:

Care

We go the extra mile to provide great outcomes for our clients to succeed.

Collaboration

We partner and work with our clients to co-create and deliver the best possible outcomes.

Inquisitiveness

We are intellectually curious and driven to deliver innovative solutions.

Enjoyment

We love what we do for our clients and we are proud of the outcomes we deliver.

These values anchor our identity and guide us in making ethical decisions. All employees are responsible for supporting Pearson Ham Group's purpose and core values daily.

While our values guide us to make the right decisions, our internal policies provide the rules of professional conduct. Pearson Ham Group's global policies apply to all members of the firm, emphasizing uncompromising ethics, integrity, mutual respect, and the highest professional standards. Our policies meet or exceed applicable laws.

This Pearson Ham Group Code of Conduct (the "Code") outlines how our core values, policies, and standards work together to make us outstanding corporate citizens, which enables us to serve our clients with unwavering results and impact. The Code reflects our priorities, and it is incumbent on each of us to follow it.

Responsibility for this Policy

The Pearson Ham Group Board of Directors (the “Board”), has overall responsibility for this policy, including reviewing the effectiveness of actions taken in response to concerns raised under this policy. Day-to-day responsibility for this policy lies with our whole team. Ultimately, each of us is responsible for the success of this policy. Comments, suggestions, and queries should be addressed to HR at susiecanny@pearsonhamgroup.com.

This policy will be reviewed at least annually.

Whistleblowing and Employee Reporting Policy

1. Definition

Whistleblowing is the disclosure of information relating to suspected wrongdoing or dangers at work, including:

- Criminal activity
- Failure to comply with legal or professional obligations or regulatory requirements
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Bribery and/or corruption
- Financial fraud or mismanagement
- Breach of internal policies and procedures, including our Code of Conduct
- Conduct likely to damage our reputation or financial wellbeing
- Unauthorized disclosure of confidential information
- Discrimination and/or harassment
- The deliberate concealment of any of the above matters

A whistleblower is someone who raises a genuine concern related to any of the above. If you have concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern), report it under this policy. If uncertain, contact the Pearson Ham Compliance team.

2. Raising a Concern

You may raise issues with your manager, HR or any manager across the team.

You will be provided an indication of next steps and HR/or the appropriate manager will manage the matter appropriately. If an investigation is necessary, we will keep you informed as much as reasonably possible, considering confidentiality requirements. False allegations made maliciously will result in disciplinary action.

3. External Disclosures

This policy is intended to provide an internal avenue for reporting, investigating, and remedying wrongdoing within Pearson Ham Group. In most cases, external reporting is unnecessary. However, in certain circumstances, you may alert an external body (e.g., a regulator). We recommend seeking advice before making external disclosures. If reporting

concerns about a third party, such as a vendor or client, law protections apply if you raise the matter with the third party directly, but we encourage internal reporting first.

4. Protection and Support for Employee Reporting/Whistleblowers

Pearson Ham Group encourages openness for staff to raise genuine concerns without fear of retaliation. Employees reporting under this policy should not be retaliated against or suffer detrimental treatment. If you feel retaliated against, contact the Compliance Team immediately. No employee may threaten or retaliate against whistleblowers. Disciplinary action will be taken against anyone involved in such conduct.

Anti-Bribery and Anti-Corruption

Pearson Ham Group is committed to the highest ethical standards and prohibits bribery in any form. When working for Pearson Ham Group or representing it in any way, bribery and corruption will not be tolerated. This policy outlines anti-corruption and anti-bribery laws to help employees, and contractors understand acceptable behaviour.

Bribery and failure to prevent it is a serious crime, carrying severe penalties. This policy applies to all Pearson Ham Group employees and third parties representing or acting on behalf of Pearson Ham Group, including subcontractors, agents, intermediaries, and business partners. Bribery includes offering, paying, promising, or providing any amount of money or item of value to induce or reward improper performance of an activity or influence any official action for Pearson Ham Group's or its clients' benefit.

This prohibition applies to transactions with government officials or private individuals or companies, whether conducted domestically or internationally, and whether the payment is direct or through a third party. Concealing bribes as charitable donations is also prohibited. Facilitation payments are also prohibited.

If in doubt about what is acceptable, communicate transparently with your manager, HR or the Operations Manager. Report any suspicion of bribery or corruption immediately.

Anti-Discrimination Policy

Pearson Ham Group aims to provide an equitable, diverse, and inclusive workplace where all employees feel welcomed and valued. We prohibit and do not tolerate discrimination based on race, colour, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, military or veteran status, citizenship, national origin, genetic information, or any other protected characteristics recognized by law. We also prohibit discrimination against those perceived to have these characteristics or who associate with individuals with these characteristics.

We actively seek out and celebrate diversity, making us a stronger firm.

Anti-Harassment

Pearson Ham Group is committed to creating a safe and comfortable workplace. We prohibit and do not tolerate any form of unlawful harassment, including sexual harassment. Harassment includes any verbal, nonverbal, or physical conduct designed to threaten, intimidate, or coerce an employee or colleague. This includes harassment based on race,



colour, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, military or veteran status, citizenship, national origin, genetic information, or appearance.

All employees contribute to making Pearson Ham Group a safe place to work.

Confidentiality, Privacy, and Information Security

At Pearson Ham Group, we handle proprietary, sensitive, or otherwise protected information. This includes clients' business priorities, personal information, and trade secrets. Confidentiality is crucial to Pearson Ham Group and its clients, colleagues, expert networks, applicants, and business partners. All employees must protect confidential information from unauthorized disclosure, use, and loss. This includes respecting ethical walls and ensuring that client data and internal material remain within authorized repositories.

Suspected policy violations, legal or regulatory breaches, or ethical breaches should be reported to the CEO and/or HR.

Non-Retaliation Policy

Pearson Ham Group ensures an open, safe, and comfortable working environment where employees feel comfortable reporting discrimination, harassment, Code of Conduct violations, or legal breaches. Retaliation against employees for reporting or participating in investigations of such behaviours in good faith is prohibited. Retaliation will result in disciplinary action.

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