



# Supplier Code of Conduct

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KEARNEY

# Preface and General Principles

Kearney strives to conduct business in an ethical and honest manner and in compliance with all applicable laws and regulations. Each year, all Kearney employees, including members of the Board of Directors, are required to affirm their commitment to the principles described in our Code of Conduct. The principles stated in our firm's Code of Conduct apply to all aspects of our business. It is crucial that Suppliers and Vendors that provide goods and services to Kearney recognize the roles they play as critical participants in fulfilling our commitment to compliance and integrity.

This Supplier Code of Conduct sets forth the principles and high ethical standards that we strive to achieve and expect our Suppliers to work toward throughout the course of our business relationship. Kearney can and will consider criteria reflecting these principles as part of any supplier assessment, contract award, or performance appraisal. This Code supplements but does not supersede any rights or obligations established in any agreement we may have with our Suppliers. In the event of a conflict, Suppliers must first adhere to applicable laws and regulations, then the contract terms and conditions, followed by the principles and ethical standards set forth in this Code.



Richard Forrest

Partner, Managing Partner Leadership Team member, and Global Sustainability Lead

Overview

**Preface and General Principles** **2**

Introduction to the Supplier Code of Conduct .....4

Compliance with the Supplier Code of Conduct .....4

**Supplier Standards** **5**

Ethical Business Practices .....5

Labor and Human Rights.....5

Equal Opportunity, Diversity and Inclusion .....6

Environmental Impact and Sustainability .....8

## Introduction to the Supplier Code of Conduct

Kearney believes certain principles are fundamental to its success, including a commitment to excellence and integrity. They are established in the firm's Code of Conduct and describe how Kearney conducts business and the type of culture we expect our Suppliers to foster.

Kearney is committed to ongoing compliance with these principles as described in our Code of Conduct, and has established internal controls to report, detect, and respond to any actions that violate them. If our Suppliers believe that they have concerns with their own behavior or with actions related to Kearney, they can confidentially report to our integrity helpline at +1-866-821-4389.

## Compliance with the Supplier Code of Conduct

All Kearney Suppliers are expected to comply with this Code and Kearney reserves the right to decline future business opportunities or to end existing business relationships with Suppliers who do not comply with this Code, applicable laws, or other Kearney policies.

Kearney expects its Suppliers to maintain adequate records to allow Kearney to monitor their performance against our contracts, values, and international employment and human rights standards (i.e., measure compliance to this Code).

Kearney may change or update the Code with notification to existing Suppliers. To the extent there is a conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement applies. Any violation of the Code, applicable laws or other Kearney policy should be reported to Kearney. You can confidentially report to our integrity helpline at +1-866-821-4389.

# Supplier Standards

## Ethical Business Practices

Our commitment to our Suppliers is one characterized by honesty, fairness, and ethical business practices. We are committed to operating our business with integrity, respect, accountability, and honor. Ethical business is everyday business at Kearney. Our Core Values – which define who we are, what we do, and how we do it – guide our actions and interactions each day. We prefer to do business with Suppliers who demonstrate a strong commitment to ethical behavior.

We expect each Supplier to conduct its business in accordance with the highest ethical standards and to have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, and embezzlement. Suppliers should similarly strive to prevent and avoid any conflict of interest, money laundering, or anti-competitive practices, and to adhere to industry standards with regard to responsible marketing, information and data security, intellectual property, confidentiality and disclosure of information. All Suppliers' business dealings should be fair, legal, and honest.

## Labor and Human Rights

We are committed to observing fair labor practices and to treating our employees with dignity and respect. We expect our Suppliers to make the same commitments in their business practices by having controls in place that verify the employment eligibility of their employees.

Kearney supports the protection of human rights around the world and is guided by fundamental principles such as those in the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) Core Conventions. This support is reflected in our policies and actions in the countries in which we do business.

We seek to support human rights throughout our supply chain by encouraging behaviors and practices that are consistent with these principles.

### **Human Rights**

Suppliers must respect the right of employees to freely associate, ensure compliance with applicable wage and hour laws, and prohibit discrimination and harassment. Suppliers should support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses.

### **Human Trafficking**

Kearney welcomes the transparency that the Modern Slavery Act encourages to combat slavery and human trafficking. Kearney works hard to ensure there is absolutely no modern slavery or human trafficking occurring in our supply chains or any part of our business. Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Suppliers must educate employees on prohibited trafficking activities, discipline

employees found to have violated the law or rules and notify the contracting officer of violations and action taken against employees.

### **Forced Labor and Child Labor**

Kearney is committed to the elimination of all forms of forced and compulsory labor, and the effective abolition of child labor. Kearney requires Suppliers to commit: 1) to not allow or procure any slavery in their organizations and supply chains; and 2) to maintain adequate records to allow Kearney to monitor their performance against our contracts, values, and international employment and human rights standards.

### **Health and Safety**

In addition to compliance with applicable legal requirements for working conditions, Kearney expects Suppliers to provide a safe and secure work environment for their employees. Our **Occupational Health & Safety Policy** provides guidelines for maintaining healthy and safe working conditions for all who work for Kearney, as well as for anyone who may be affected by its activities. Kearney expects its Suppliers to maintain their own Health & Safety Policy establishing clear and comprehensive standards and procedures which minimize risk to employees while enhancing worker wellbeing.

## **Equal Opportunity, Diversity and Inclusion**

Kearney is an equal opportunity employer, committed to nurturing a diverse and inclusive workforce while also promoting diversity in our supply chain. Kearney works to foster an inclusive work environment where all employees feel valued, respected, and empowered to contribute their best work. We expect the same from our Suppliers.

Kearney is committed to nurturing a diverse supplier base and encourages its employees to continue growing relationships with minority businesses and suppliers as well. We are committed to working with diverse suppliers including minority and women-owned businesses, disadvantaged businesses, non-governmental organizations (NGOs), small and medium-sized enterprises (SMEs), veteran-owned organizations, and disability-owned organizations. We proactively monitor key supply chain diversity metrics including what percentage of our total spend is sourced from diverse suppliers. To maintain a comprehensive and accurate view of our supply base's diversity performance, we issue a survey to every new Supplier with questions related to their diversity and inclusion policies. We actively encourage participation, and regularly monitor results to help guide our diversity strategy.

Kearney promotes conditions of employment without regard to a person's gender identity or expression, sexual orientation, race or ethnicity, religion, age, national origin, disability, marital status, pregnancy status, veteran status, genetic information, or any other differences consistent with applicable laws. We actively encourage our Suppliers to promote equally non-discriminatory and disability-inclusive workplace environments, such as the accessibility of products and services, Kearney rejects all forms of racism, discrimination, and bigotry, and urges both its own employees and its Suppliers to help combat these.

In line with our own values, Kearney expects its Suppliers to respect the right of employees and prohibit any form of discrimination and harassment. Suppliers should support and respect the protection of internationally proclaimed human rights (including those covered by the UN's LGBTI Standards of Conduct for Business, which Kearney supports) and promote ethical recruitment practices, equal opportunity, diversity, and inclusion in the workplace and across their own supplier base.

In many jurisdictions, such as the United States and European Union, violations of these standards can violate the law. In any case, these standards represent the values of our firm, wherever we conduct business.

# Environmental Impact and Sustainability

The environmental and social commitment at Kearney is integral to good business practices. Kearney encourages and relies upon Suppliers to join us in that commitment by proactively developing internal programs designed to foster a culture of sustainability and the use of environmentally friendly technologies and processes. That includes measuring impacts, setting environmental and social targets, reducing negative impacts, and promoting decarbonization where possible and reporting on progress.

Suppliers must comply with all applicable environmental laws and regulations in the countries where the Supplier operates. Suppliers should conduct operations in a manner that protects the environment by making reasonable efforts to meet industry best practices and standards with respect to the reduction of energy use, greenhouse gas emissions, renewable energy adoption, waste reduction, re-use, and recycling as well as water quality, consumption, and management. Suppliers must also ensure that potential impacts to the community's health, safety, and security and to natural ecosystems – such as environmental accidents, impacts on natural resources, including negative impacts on animal welfare, biodiversity, deforestation and soil quality, exposure to pollution and noise emissions or other community issues – that may arise from business operations are appropriately mitigated and managed. Suppliers should also conduct operations in compliance with applicable laws with regards to chemicals handling and management.

In the aforementioned Supplier survey, a number of environmental and sustainability-related questions are also included to support our understanding of how sustainability impacts our business. Kearney relies on Suppliers to promote environmental and social stewardship and highlight opportunities to improve our understanding and management.

## Closing remarks

For any questions or feedback, please feel free to reach out to us at [supplier.sustainability@kearney.com](mailto:supplier.sustainability@kearney.com) or your local Kearney contact directly.

**We thank you in advance for your collaboration and your shared commitment around sustainability, diversity and ethical business practices.**  
**Additional Information**

Document availability	PDF published on Kearney internal intranet and public website
Policy scope	Kearney suppliers and buyers
Initial document publication	January, 2018
Present document publication	March, 2024
Version	4.0
Policy review timeline	Every 2 years
Policy owner and contact	Pei Yun Teng, Global Director Social Impact PeiYun.Teng@kearney.com
Approval	Managing Partner Leadership Team