



Supplier code of conduct

Our uncompromising commitment to excellence
and ethical conduct by our suppliers

2025



Our supplier code of conduct



Standard of conduct

Grant Thornton Advisors LLC (“GT Advisors”), along with its domestic and international entities directly or indirectly controlled by, controlling, or under common control with GT Advisors, and their service centers, respective alternative practice structure platform members, and affiliates/subsidiaries (collectively, “GT Entities” or “we”) are committed to conducting business ethically and in compliance with applicable laws, regulations, and professional standards of conduct. We seek to work with Suppliers that share these values.

This Supplier Code of Conduct (the “Code”) reflects our core values—Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility—which are embedded in our culture. It is our expectation that each Supplier and Representative (as defined below) we engage will embody these qualities. Although we recognize that our Suppliers are independent entities, their actions may impact us and our reputation.

We expect Suppliers to take reasonable steps, including implementation of adequate processes and controls as may be appropriate, to adhere to the obligations in this Code and to communicate this Code to Representatives and related entities (including fourth parties) involved in providing goods, performing services, or undertaking any activity for or on our behalf. If a conflict exists between this Code and an applicable law or regulation, the more restrictive requirement shall apply.

“Supplier” means any vendor, service provider, or other third-party providing goods or services to GT Entities.

“Representative” means any director, officer, partner employee, independent contractor, subcontractor, agent, or other affiliate of Supplier who is involved in work on our behalf.



This Code is a critical component of our Third-Party Risk Management (TPRM) program. Compliance with this Code aligns with the broader lifecycle expectations outlined in our TPRM Framework, including risk assessment, due diligence, contract adherence, and ongoing monitoring.



Compliance with laws

Suppliers and their Representatives must comply with all applicable laws, regulations, directives, and standards of conduct in every jurisdiction where they operate or deliver goods and/or services on our behalf. This includes, but is not limited to, applicable economic sanctions and export control laws and regulations, anti-bribery and anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act of 2010, anti-money laundering laws, and insider trading laws. Suppliers must also adhere to applicable data protection, financial, and employment laws including, for example, laws addressing harassment, discrimination, and forced or child labor.

Suppliers must not operate in jurisdictions which are comprehensively sanctioned by the U.S. Treasury’s Office of Foreign Assets Control (OFAC) or any other applicable authority such as UN, EU, or UK sanctions regimes.

Suppliers are expected to actively monitor changes in relevant legal and regulatory environments and promptly notify us of any emerging legal or compliance risks that may affect their ability to meet contractual or regulatory obligations. Where services or data handling involve offshore or cross-border activities, Suppliers must disclose such in advance, including identifying any subcontractors or affiliates, and may be subject to additional contractual terms, due diligence or approval.



Integrity and ethics

We are committed to acting honestly and fairly in our relationships with our clients and vendors, and we strive to provide the highest quality of service to our clients. We build our relationships with clients and vendors on transparency, mutual trust, and open communication. We seek to engage with Suppliers that conduct business with ethical standards consistent with our own.

Business integrity

Integrity is vital for sustainable relationships. We expect Suppliers to operate ethically, encourage honesty, equality and transparency, and to uphold the highest standards of ethical and fair business practices. Suppliers shall maintain and use reasonable policies and procedures aimed at preventing bribery in all forms and to support efforts to combat all forms of fraud,

corruption, extortion, embezzlement, and influence peddling. Suppliers shall not engage in or assist another party to engage in money laundering, terrorist financing, proliferation financing or other criminal activities.

Prohibition of improper payments

Suppliers shall not offer, promise, give, authorize giving, request, or accept bribes, kickbacks, gifts, payments, facilitation payments or anything of value—directly or indirectly—in exchange for an improper business advantage.

Business courtesies

Business courtesies provided or accepted by Suppliers or their Representatives in connection with our business must be reasonable, transparent, properly documented, legal under applicable law, permissible under the recipient's policies or rules, and offered only in connection with legitimate business activities.

Suppliers and their Representatives must obtain pre-approval from GT Entities before providing business courtesies to government officials or employees in connection with our business.

Fair competition

We expect Suppliers and their Representatives to conduct their business consistent with fair competition and business practices, and to comply with applicable fair competition and anti-trust laws and regulations.

Conflicts of interest

Suppliers must not allow bias, conflict of interest, or inappropriate influence of others to improperly affect their responsibilities and professional judgements. Suppliers must disclose all potential conflicts of interest, including those in which Suppliers may have been placed inadvertently due to either business or personal relationships with our clients, vendors, business associates, competitors, or personnel, and take reasonable steps to address and remediate any such potential conflicts of interest.

Neither Suppliers nor their Representatives may act on our behalf in any transaction or business relationship involving themselves or members of their family, or other persons or organizations with which they or their family have any significant personal connection or financial interest.

Confidentiality and intellectual property

Intellectual property rights of ours and our clients must be respected. The use and transfer of technology and knowledge must be carried out using standards consistent with this Code and Supplier's contract with us. Suppliers shall abide by their obligations regarding the protection, collection, and proper handling of confidential and personal information in the country or countries in which Suppliers operate.

Investigations or legal actions

Suppliers are expected to cooperate with us, and with law enforcement and regulatory agencies, in the event of any investigation of wrongdoing related to our business. Should Suppliers receive any subpoenas, regulatory requests, or similar government inquiries concerning GT Entities, Suppliers shall promptly notify us of such request to the extent permitted by law.



Information security and data privacy

Security, privacy, and the protection and availability of data are our top priorities. Suppliers must cooperate with our third-party risk assessments, including the completion of inherent and residual risk questionnaires and periodic reassessments. Where material risks are identified, Suppliers are expected to participate in remediation efforts or risk acceptance processes.

Cybersecurity

We expect our technology Suppliers that store, transmit or process our data (including client data) to design and implement their controls to meet or exceed ISO 27001 and other relevant standards. If we request Suppliers to obtain additional relevant certifications or meet additional relevant standards, Suppliers shall make good faith efforts to comply in a reasonable timeframe. Suppliers may be assessed for their compliance with our information security policies and applicable standards. In addition, Suppliers with access to client engagement data are required to contractually commit to implementing and maintaining appropriate security and privacy safeguards.

Data privacy

Suppliers who have access to personal information of our clients or personnel must design and implement policies, procedures, and controls that meet or exceed ISO 27701 or similar standards, and must adhere to all applicable data privacy laws. Suppliers are expected to reasonably cooperate with requests to assist us in honoring data subject access requests and will limit or cease the processing of our personal information upon our instruction.

Business continuity

We expect Suppliers to have a business continuity plan in place that addresses how they will respond to, mitigate, and recover from business disruptions, including considerations for employee and environmental safety and how to resume normal business operations within contractual timeframes. Examples of such events include, but are not limited to, technological failures, supply chain interruptions, natural disasters, epidemics, pandemics, and human-related conflicts such as war, terrorist acts, riots, or other civil unrest.



Respect in the workplace

A respectful workplace is one that affords employees equal opportunity to pursue their goals in an environment where people are collaborative and respectful of one another. Suppliers must foster a culture that promotes equal opportunity for all. Suppliers and their Representatives shall not discriminate or tolerate harassment against anyone based on race, color, religion, national origin, citizenship or immigration status, genetic information, age, disability, pregnancy, sex, marital status, veteran status, or any other characteristic protected by applicable laws. Suppliers shall not retaliate against individuals who raise concerns regarding discrimination or harassment. Suppliers should encourage individuals to raise concerns about discrimination and harassment and have appropriate processes in place to receive, review and address reported concerns.

We do not tolerate any workplace violence or bullying (whether verbal, physical or otherwise), including threats, threatening behavior, intimidation, or similar conduct. We, in our sole discretion, may remove from the premises or terminate access for any Supplier or Representative who engages in offending behavior.

We expect Suppliers to have a policy in place to provide reasonable accommodations to persons with disabilities (visible and invisible), and to consider individuals with diverse abilities when providing products or delivering services to or on our behalf.

We comply with all applicable labor and employment regulations. We make every effort to listen and respond to the concerns and needs of our personnel, and our policies support a reporting culture that is free of retaliation. We expect our Suppliers to do the same.



Human rights

Suppliers must respect the rights of their employees (including, but not limited to, the rights set forth in this Code) and take reasonable steps to ensure that no exploitation of child labor or any other vulnerable group (e.g., unauthorized immigrants) takes place in its business or its supply chain.

Child labor

Suppliers are prohibited from using workers under the legal age of employment in any country or local jurisdiction where Suppliers perform work for us. If the minimum age of employment is not defined by local jurisdiction, the minimum age of employment shall be 16 years of age.

In cases where minors are authorized to work, we expect our Suppliers to observe all legal requirements, particularly those pertaining to required permits, hours of work, wages, and working conditions.

Forced labor

Suppliers shall not employ nor use any form of forced or bonded labor, or other forms of slavery or human trafficking and will take all reasonable steps to ensure that there is no form of forced, bonded or compulsory labor, or other forms of slavery or human trafficking employed or used within its business or in its supply chain. Suppliers shall treat everyone with dignity. Suppliers shall not demand work from an individual under threat or coercion.

Compensation and hours

Suppliers and their Representatives shall comply with all applicable employment and labor laws, rules, and regulations, including as they relate to work environment and conditions, work hours, pay transparency, wages, and benefits. Suppliers shall pay all employees in compliance with applicable wage laws and at least the legal minimum wage in the country or countries in which they operate.

Health and safety

The safety of our personnel and the employees of our clients and vendors is of the utmost importance to us. We expect Suppliers to comply with applicable standards and local regulations of occupational health and safety at a high level and to provide a work environment that is safe and conducive to good health (e.g., clean and safe facilities, properly maintained equipment, sufficiently lighted and ventilated facilities). Suppliers shall take necessary precautions to prevent accidents and work-related injuries.

Where necessary, Representatives shall receive adequate health and safety training (including practices necessary to mitigate risk) so that they can understand the hazards associated with their activities and their work environment. Firearms and any other weapons are not allowed on our premises, and we do not permit our personnel, Suppliers or Representatives to bring any such firearms or other weapons to our clients' premises. Firearms and any other weapons may not be carried when conducting any of our business or our clients' business. No Suppliers or Representatives are permitted to use, possess, consume, distribute, sell, solicit or be under the influence of alcohol and illegal drugs (and legal drugs that are not used in a manner consistent with dosage requirements provided by a licensed healthcare professional) while at our or our clients' sites. Any Suppliers or Representatives found to be in violation may be removed from the applicable site and not be allowed to re-enter such site, any other site of ours or our clients' sites.



Environment

We are committed to minimizing our environmental footprint and actively managing our impact on the environment as an integral component of our business strategy. That commitment includes compliance with all applicable environmental laws and regulations; establishing and maintaining appropriate governance and accountability procedures; driving environmentally responsible behavior in our operations; implementing initiatives to minimize our environmental impacts, including our greenhouse gas (GHG) emissions and waste; and engaging with our stakeholders to promote environmental awareness and stewardship.

We also have goals to achieve a **55% absolute reduction of our GHG emissions by 2030 from a 2019 baseline and achieve net-zero emissions by 2050**. Achieving these goals will require engagement with our Suppliers to understand the environmental impacts and GHG emissions associated with our purchased goods and services.

We expect Suppliers to comply with all applicable environmental laws, regulations and standards in the country or countries in which they operate. Additionally, we encourage Suppliers to commit to, and to encourage its suppliers to commit to, minimizing their environmental impacts and GHG emissions by creating and maintaining a GHG emissions inventory covering applicable emissions scopes, setting achievable GHG reduction plans and reporting on progress.



Equal opportunity for all

We value equal opportunity for all. We have seen firsthand the power of bringing one's whole self to work and providing everyone an equal opportunity for participation and advancement, without regard for race, ethnicity, disability (visible and invisible), nationality, religion, generation, background and lived experience. We have experienced the benefits of the dynamic and innovative environment that results. Our people thrive personally and professionally because all perspectives are valued and heard equally.

We encourage Suppliers to promote equal opportunity and access at all levels. We expect Suppliers to have an explicit equal opportunity policy that applies to all personnel actions and to comply with any applicable anti-discrimination, anti-harassment,

and anti-retaliation laws in the country or countries in which they operate.

We further expect Suppliers to require their employees to be familiar with their equal opportunity, anti-discrimination/harassment, and anti-retaliation policies, including any complaint reporting policies.



Community involvement

Our commitment to giving back to our communities is more than an aspiration. It is action and purpose rooted in the values we have lived by for over 100 years. These values of Collaboration, Leadership, Excellence, Agility, Respect and Responsibility infuse our work and culture. This enables us to see endless possibilities when we collaborate together, and with our clients, Suppliers and communities, to help make our communities more inclusive and prosperous for all.

We seek to engage with Suppliers that support initiatives to improve education, culture, and the economic and social well-being of the communities in which they live and serve and encourage Suppliers to do so. Suppliers may not make charitable or political donations in exchange for business advantages or for any improper purpose.



Reporting and non-retaliation

As our Suppliers, your role begins, but does not end with, understanding this Code. Suppliers are expected to self-monitor compliance through their own administrative processes and to bring violations or suspected violations of this Code to our attention.

We want to hear from you when you have a concern about unethical behavior related to our business. You can report ethical concerns by contacting your primary GT Entities contact, or by reporting the matter to the [Ethics Hotline](#). If Suppliers or Representatives suspect that our personnel or anyone acting on our behalf has engaged in illegal or improper conduct, Suppliers or Representatives should report the incident by contacting the [Ethics Hotline](#) as noted above.

We expressly prohibit, and expect Suppliers to expressly prohibit, retaliation against personnel who raise good faith concerns of ethics violations including violations of policy or law, or who participate in an internal or external investigation. Additionally, we make, and expect Suppliers to make, all efforts to protect the confidentiality of those who raise concerns regarding ethical, fraudulent or unlawful activity, and to share information only on a need-to-know basis.



Monitoring

Suppliers are responsible for monitoring adherence to this Code for themselves and their supply chain, including any subcontractors with whom they do business on our behalf. All Suppliers must be able to demonstrate compliance with these requirements at our request.

- Suppliers are expected to cooperate with such activities.
- Suppliers are expected to keep records related to our business that are accurate, reliable, and complete. Official records related to our business must not be altered or destroyed for any improper or illegal purpose.
- Suppliers must maintain adequate oversight of any subcontractors or fourth parties engaged in the delivery of services to us. This includes ensuring that such entities adhere to this Code and are subject to equivalent controls and assessments. Suppliers must disclose any material changes in their subcontractor relationships or offshore delivery models that may impact our risk profile.

We may monitor compliance with the principles of this Code by conducting compliance surveys, audits, or verifications that we deem appropriate in collaboration with Suppliers and Representatives.

- Suppliers shall reasonably cooperate with us in such efforts within an appropriate timeframe.
- Suppliers shall take necessary corrective actions to promptly remediate any noncompliance with this Code and will actively engage in any remediation. We reserve the right to terminate business at any time for noncompliance with this Code.



Quality management

Suppliers and their Representatives are expected to maintain high standards of quality management within their business. Audit firms who use third-party products or services in the audit firm's system of quality management must ensure that all Suppliers and their Representatives (i) understand and fulfil relevant ethical requirements that apply to them and (ii) the services or products are appropriate for use in the audit firm's system of quality management. To satisfy these requirements, Suppliers and their Representatives may be required to provide information as requested by us to make such assessments as part of onboarding or other processes.



Continuous improvement

We expect Suppliers and Representatives to adhere to and live by the principles set forth in this Code. We expect Suppliers to actively monitor and evaluate their related day to day processes and practices with the goal of continuous improvement. This Code is available online and may be revised and updated by us from time to time.





Grant Thornton

GT.COM

This content provides information and comments on current issues and developments from Grant Thornton Advisors LLC and Grant Thornton LLP. It is not a comprehensive analysis of the subject matter covered. It is not, and should not be construed as, accounting, legal, tax, or professional advice provided by Grant Thornton Advisors LLC and Grant Thornton LLP. All relevant facts and circumstances, including the pertinent authoritative literature, need to be considered to arrive at conclusions that comply with matters addressed in this content.

For additional information on topics covered in this content, contact a Grant Thornton professional.

"Grant Thornton" refers to the brand name under which the Grant Thornton member firms provide services to their clients and/or refers to one or more member firms, as the context requires.

Grant Thornton LLP and Grant Thornton Advisors LLC (and their respective subsidiary entities) practice as an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations and professional standards. Grant Thornton LLP is a licensed independent CPA firm that provides attest services to its clients, and Grant Thornton Advisors LLC and its subsidiary entities provide tax and business consulting services to their clients. Grant Thornton Advisors LLC and its subsidiary entities are not licensed CPA firms.

Grant Thornton International Limited (GTIL) and the member firms, including Grant Thornton LLP and Grant Thornton Advisors LLC, are not a worldwide partnership. GTIL and each member firm are separate legal entities. Services are delivered by the member firms, GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.

© 2025 Grant Thornton Advisors LLC | All rights reserved | U.S. member firm of Grant Thornton International Ltd.