

# The Hackett Group Code of Conduct and Ethics

The Hackett Group, Inc.

January, 2008

## **Letter From the Chairman**

One of our company's most valuable assets is its reputation for integrity and fairness. Maintaining that reputation is one of our most important jobs. With the recent events involving corporate ethics and disclosure it is more important than ever to ensure we have a Code of Conduct and Ethics that is clearly articulated. This Code requires us to conduct our business consistent with our values and in accordance with applicable laws. It requires that we be responsible to the concerns of the communities in which we operate and exercise the highest degree of honesty and integrity in our dealings with others. These guidelines are intended to help each of us understand our responsibilities and make the right choices. They are also meant to stimulate awareness of ethical issues that we may encounter in our daily business activities. Doing the right thing begins with basic honesty and integrity. More than ever, it also depends on our good judgment and sensitivity to the way others see us and how they may interpret our actions. Your acknowledgment that you have read and are in full compliance with our Code of Conduct and Ethics, and your continued compliance with the Code of Conduct and Ethics, are conditions of employment at The Hackett Group. After reviewing our Code of Conduct and Ethics, please submit your acknowledgment to Human Resources via the form that can be accessed on the last page of the Code of Conduct and Ethics. Each of us is responsible for The Hackett Group's reputation. I ask that each person in the The Hackett Group community make a personal commitment to follow our Code of Conduct and Ethics. All The Hackett Group associates must comply not only with the letter of these policies, but also with their spirit.

**Ted Fernandez**

Chairman and Chief Executive Officer

## Preamble

It is important for you to understand that:

- You are personally responsible for your own conduct in complying with all provisions of this Code of Conduct and Ethics and for promptly reporting known or suspected violations of this Code of Conduct and Ethics to your supervisor or project manager, or Human Resources, or to the Legal Department.
- If you are a supervisor or project manager, you must use your best efforts to ensure that your associates understand and comply with this Code of Conduct and Ethics.
- If you are a supervisor or project manager and your delivery team includes client resources, you must use all means within your reasonable control to ensure that the client resources act at all times in a manner consistent with the letter and spirit of this Code of Conduct and Ethics.
- No one, not even a client, has the authority or right to order, request, or even influence you to violate this Code of Conduct and Ethics or the law.
- You will not be excused for violating this Code of Conduct and Ethics for any reason, even at the request of another person.
- Any retaliation or threat of retaliation against any person for refusing to violate this Code of Conduct and Ethics or for reporting in good faith a violation or suspected violation of this Code of Conduct and Ethics will not be tolerated, and is itself a violation and may be a violation of the law.
- Every reported violation of this Code of Conduct and Ethics will be investigated and every actual violation will constitute a valid ground for dismissal of the person violating this Code of Conduct and Ethics and may result in civil or criminal action against that person. This Code of Conduct and Ethics applies to all associates of The Hackett Group and its subsidiaries. This Code of Conduct and Ethics should not be construed as a contract of employment, and does not change any person's status as an at-will associate. If you are in doubt about whether any action violates this Code of Conduct and Ethics, please consult Human Resources or the Legal Department.

## Corporate Standards

- We require your commitment to:
- Obey all laws and regulations
- Act with integrity and honesty Always act in a way that is above reproach
- Treat people fairly
- Be responsible
- Respect diversity
- Communicate openly

## Detailed Policies

Note that several of the Code of Conduct and Ethics topics listed below refer to more detailed policies contained in other documents. You are required to read the more detailed policy when referenced. Your acknowledgment that you have reviewed this Code of Conduct and Ethics shall mean that you have read,

understood, and are in full compliance with this Code of Conduct and Ethics, as well as the more detailed policies referenced in other documents.

### **Accurate Books and Records**

Our policy is to maintain accurate and complete company records at all times. If you are a record keeper of any kind, you must never misrepresent facts or falsify records. You must always report all information (such as information in expense reports, financial statements, reports to auditors and governmental agencies, and invoices) in an accurate, honest and timely manner. Financial transactions must be promptly and accurately recorded in accordance with generally accepted accounting principles and established internal controls.

### **Antitrust Law Compliance**

The fundamental principle of our antitrust policy is full compliance with the law. The antitrust laws are designed to promote vigorous, free and open competition.

#### **No associate should ever:**

- Discuss or make any agreement with a competitor regarding prices, pricing, pricing practices, bids, bidding practices, costs, margins, discounts, credit terms, warranties, other terms or conditions of sale, marketing practices or strategies, customers, suppliers, or any other competitively sensitive matter.
- Discuss or make any agreement with a competitor to coordinate or allocate bids, customers, or territories. There are certain situations in which joint bidding proposals may be allowed, but you should consult with the Legal Department in advance before discussing such matters with a competitor.
- Divide customers, markets or territories with a competitor.
- Engage in any other unfair methods of competition or deceptive acts or practices under the antitrust laws. A prohibited agreement with a competitor or customer does not have to be a written contract or even involve an express commitment. A tacit understanding or even a silent approval may be sufficient. Since we operate in a highly competitive market in which prices and terms of sale may be very similar among competitors, it is very important to avoid even the appearance of an illegal agreement. Therefore, it is our policy that unless it has been approved by our Legal Department, no associate may even discuss with any competitor sensitive subjects such as prices, pricing, pricing practices, bids, bidding practices, costs, margins, discounts, credit terms, warranties, other terms or conditions of sale, marketing practices or strategies, customers, suppliers, or any other competitively sensitive matter. Similarly, you must never send or receive any information of the type described above to or from any competitor. Prior approval of our Legal Department must be obtained before submitting statistics to a trade association or journal. Finally, you should never remain at a trade association meeting or conference in which any of these sensitive matters are discussed.

### **Care of Assets/Use of Company Resources**

All equipment, supplies, software and other assets used in our business must be treated with care. You are responsible for ensuring that all equipment issued to you is properly used and maintained. Unauthorized use of company equipment, supplies, software or other assets including any use that is in violation of this Code of Conduct and Ethics is prohibited. You must never make unauthorized copies of any company software or remove any company equipment or other assets from our premises without specific authorization. (Please also refer to the Electronic Communications Policy located on the Human Resources page on Mind~Share).

## **Confidentiality**

You must maintain the confidentiality of nonpublic information about our company and about our customers and business partners with whom we do business. Confidential information is any information of a confidential, proprietary or secret nature related to our business or relating to another business but disclosed to us in connection with our business including, among other things, confidential business processes, practices or results of operations, trade secrets, manufacturing techniques, research and development information, business plans or forecasts including plans with respect to proposed acquisitions of other companies or their assets, personnel information, marketing plans, information concerning customers and vendors, and information concerning any pending or threatened litigation or other claims against our company. You may never disclose confidential information to outsiders including customers, suppliers, press representatives, an Internet chat room, message boards, or Web sites, or even to other associates whose duties do not require them to have the information. You may not use confidential business information to advance your personal interests or that of any third party through investment activities or otherwise. Please refer to the confidentiality restrictions contained in your Employment Agreement or Compliance Agreement. (Please also refer to "Insider Trading" on page 7).

## **Conflicts Of Interest**

You must be free of any involvement or investment which interferes, or could appear to interfere, with the exercise of your independent judgment in the best interests of the company, or which could constitute, contribute to, or suggest such a conflict of interest. A "conflict of interest" exists when a person's private interest interferes in any way (or even appears to interfere) with the interests of the company as a whole. A conflict situation can arise when an associate or agent of the company takes actions or has interests that may make it difficult to perform his or her company work objectively or effectively. Conflicts of interest also arise when an associate or agent of the company or a member of his or her family, receives improper personal benefits as a result of his or her position with the company. Conflicts of interest are generally prohibited as a matter of company policy. Conflicts of interest may not be clear-cut, so if you have a question, you should consult your supervisor. Any associate who becomes aware of a conflict should bring it to the attention of their supervisor, project manager, Human Resources or Legal Department.

A conflict of interest or the appearance thereof can arise when your interest in, association with, and/or employment by a competitor of the company, a supplier of goods or services to the company, or a customer of the company, is such that your ability to act in the best interests of the company may be questioned.

### **For example, you should not:**

- Work for or receive compensation for services from any supplier, customer or competitor without the approval of the Legal Department.
- Own any substantial financial interest in a supplier, customer or competitor if you influence, or may appear to influence, business decisions of the company or the supplier, customer or competitor as they relate to one another, except an investment in a supplier, key customer or competitor that is listed on a national securities exchange or traded in the over-countermarket shall not be considered a violation of this policy if, as a result of the investment, the person does not own more than 5 percent of the stock of such corporation.
- Perform non-company work or solicit noncompany work on the company's premises or while working on the company's time, including any paid leave you are granted by the company. Also, you are not permitted to use company assets (including equipment, telephones, materials, resources or proprietary

information) for any outside work. (Please refer to “Care of Assets/Use of Company Resources” on page 2.)

- Accept, solicit or give gifts, gratuities, entertainment or any other personal benefit or favor from or to a supplier, potential supplier or key customer or competitor.

**You may:**

- Accept or give gifts of relatively minor value or advertising and promotional materials clearly marked with the company or brand names.
- Accept or offer entertainment if it arises out of the ordinary course of business, involves reasonable, not lavish, expenditures, and takes place in settings that are reasonably appropriate and fitting to you, your hosts and the business at hand. Limited exception of this policy may be made in connection with The Hackett Group-approved promotional events, advertising or publicity. (Please refer to “Waiver of Code of Conduct and Ethics” on page 9).

**Considerations Unique to our Board of Directors and Executive Officers:**

- The Hackett Group outside directors who are interested in serving on the Board of Directors of other companies, or who seek to provide services to any customer or competitor for which compensation will be received, should consult with the Chief Executive Officer.
- The Hackett Group Executive Officers should not engage the company’s independent auditors to provide tax-consulting advice. Outside board members should only engage the company’s independent auditors to provide tax-consulting advice after consultation with the company’s Chief Executive Officer.

**Corporate Opportunities**

Associates are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position. No associate may use corporate property, information, or position for improper personal gain. Associates owe a duty to the company to advance its legitimate interests when the opportunity to do so arises.

**Financial Officer Code of Ethics**

We require honest and accurate recording and reporting of information in order to make responsible business decisions. All of the company’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the company’s transactions and must conform both to applicable legal and accounting requirements and to our system of internal controls. Unrecorded or “off the books” transactions, records, assets or liabilities should not be maintained under any circumstances.

Because of their special roles, the Chief Executive Officer, President, Chief Operating Officer, Chief Financial Officer, Corporate Controller or if there shall be no Corporate Controller, any person performing the duties typically performed by the Corporate Controller and General Counsel are bound by the following Financial Officer Code of Ethics, and by acknowledging the Code of Conduct and Ethics, each agrees that he or she will:

- Act honestly and ethically, including the ethical handling of actual or apparent conflicts of interest involving personal and professional relationships;
- Provide full, fair, accurate, timely and understandable disclosure in reports and documents that a registrant files with, or submits to, the United States Securities and Exchange Commission and in other public communications made by the company;

- Comply with all applicable rules and regulations of all governmental entities, as well as other private and public regulatory agencies to which the company is subject;
- Promptly report violations of the Code of Conduct and Ethics including the provisions of this Financial Officer Code of Ethics to an appropriate person or persons within the company;
- Promote ethical behavior among associates under his or her supervision at the company and clearly communicate that violations of the Code of Conduct and Ethics including this Financial Officer Code of Ethics will not be tolerated.

Violations of this Financial Officer Code of Ethics, including failure to report potential violations by others, will be viewed as a severe disciplinary matter that may result in personnel action, including termination of employment, and, where appropriate, civil liability and criminal prosecution. It is against the law for the company to retaliate against any associate for good faith reporting of violations of these ethical obligations.

If you believe that a violation of these ethical obligations has occurred, please contact the Legal Department.

You can report your concerns confidentially or anonymously. Please also refer to Procedures for Receipt of Complaints and Concerns Regarding Accounting or Auditing Matters on page 9)

### **Corporate Disclosure**

Our policy is to make timely public disclosure of all company information as required by law, regulation, any stock exchange rules to which we are subject, and/or sound business policy, while at the same time remaining in compliance with all securities and other laws that require us to always make accurate disclosure and prohibit us from making “selective disclosures.” In order to ensure that all disclosures of company information such as acquisitions, revenue and earnings information and other developments of material importance to investors, regulators and the general public are accurate and in full compliance with the law, it is our policy that all such disclosures will be made only in accordance with the company’s disclosure controls and procedures and through specifically established channels. Unless you have been specifically authorized to do so, you are strictly prohibited from discussing company affairs of the type described above with securities analysts, media representatives, government officials and other outsiders. Should any securities analyst, media representative, government official or other outside contact request an interview with you or seek any company information from you of the type described above, whether or not confidential or proprietary, you should refer them to the Chief Executive Officer or to our Chief Financial Officer. (Please also refer to “Insider Trading” on page 7 and to The Hackett Group Insider Trading Policy located on the Corporate page on Mind~Share).

Please also refer to The Hackett Group Insider Trading Policy located on the Corporate page on Mind~Share.

### **Document Retention**

From time to time, we receive requests from government agencies or other third parties for documents relating to our business. Once we have received such a request, we are often prohibited by law from destroying any document that would be responsive to that request. If you are advised that we have received any such document or request, you must not destroy any requested or related documents until you have been advised by our Legal Department that you are permitted to do so. If you have a question about whether a document is related to such a request, please contact the Legal Department to determine if the document is related to the request. During the project delivery phase, it is a Hackett Group requirement to compile complete documentation of the project’s history. Each project should be fully documented in the event it needs to be referenced at a later time. At the completion of a project, both the Key File and Supporting File should be forwarded to the attention of the Office of Risk Management (ORM) in the Burlington, MA office. The ORM will

catalogue and archive the files for seven years. The Project Manager has the ultimate responsibility to ensure compliance with the project file requirements.

(Please also refer to the Document Retention Policies located on the Legal Department page on Mind~Share and to the project document retention policy in the Client Service Cycle toolkit located on the Delivery Services page on Mind~Share).

### **Drug-Free Workplace**

Our policy is to maintain a drug-free workplace. All associates must report to work free from the influence of any drugs or alcohol. You may not manufacture, distribute, sell, or possess illegal drugs at any time on company premises. In addition, you may not use or be under the influence of illegal drugs or substances, or misuse legal drugs at any time on company premises, while on company business or while driving vehicles owned, rented or leased by our company.

### **E-Mail and Internet Use**

All associates are provided with e-mail and Internet access. These are powerful communication tools and valuable business assets. However, improper use of e-mail and Internet services can waste time and resources and create legal liabilities and embarrassment for our associates and our company. You should use extreme caution when using e-mail to transmit information which may contain our company trade secrets, business plans, or any other confidential or proprietary information including the confidential or proprietary information of others. You must anticipate that an e-mail message might be disclosed to or read by individuals other than the intended recipient(s), since messages can easily be forward to other individuals. While we try to maintain the reliability of our e-mail systems, you should be aware that a variety of human and system errors have the potential to cause inadvertent or accidental disclosures of e-mail messages. If you have any doubt about the electronic security measures employed by the recipient of an e-mail message, you should not send the information by e-mail, but instead employ an alternate, more secure method of transmission. Also, you should assume that e-mail messages are retained indefinitely. You should also assume that even after you have "deleted" them, all "deleted" messages can be retrieved. Furthermore, you should understand that all email can be used as evidence in an investigation or dispute. Because e-mail messages can often be read out of context, it is extremely important that you avoid writing any e-mail message that may appear to violate any provision of the law or this Code of Conduct and Ethics.

(Please refer to the detailed The Hackett Group Electronic Communications Policy located on the Human Resources page on Mind~Share).

### **Equal Opportunity**

Our policy is to provide recruitment, hiring, training, compensation, transfer, promotion, termination and all other conditions of employment for all persons based on merit qualifications and competency without discrimination on the basis of race, color, religion, sex, age, sexual orientation, national origin or ancestry, disability, medical condition, marital status, veteran status or any status protected by law and not listed here. Fulfillment of our commitment to equal employment opportunity requires actions by all associates throughout our company. We all have a responsibility to promote equal employment opportunities.

(Please refer to the detailed The Hackett Group equal opportunity statement located on the Human Resources page of Mind~Share).

### **Harassment**

Our policy is to provide a work environment that is pleasant, professional, and free from intimidation, hostility, or other offenses that might interfere with work performance. We will not tolerate harassment of any kind —

verbal, physical, or visual — particularly against associates in protected classes. These classes include, but are not necessarily limited to, race, color, religion, sex, age, sexual orientation, national origin or ancestry, disability, medical condition, marital status, veteran status, or any other status protected by law and not listed here.

Workplace harassment can take many forms. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, email jokes or statements, unwelcome invitations, pranks, intimidation, physical assaults or contact, or violence. Other prohibited conduct includes producing or distributing written or printed material of a harassing or offensive nature including notes, photographs, cartoons or articles and taking retaliatory action against an associate for discussing or making a harassment complaint. Sexual harassment may include unwelcome sexual advances, requests for sexual favors, unwelcome physical contact or other communications of a sexual nature when such conduct creates an offensive, hostile and intimidating working environment and prevents an individual from effectively performing the duties of his or her position. It also encompasses such conduct when it is made a term or condition of employment or compensation, either implicitly or explicitly, or when an employment decision is based on an individual acceptance or rejection of such conduct. It is important to note that sexual harassment crosses age and gender boundaries and cannot be stereotyped.

If you are harassed, we encourage you to make it clear that the harasser's behavior is unacceptable, unwelcome and offensive and must stop immediately. However, it is not required that you do so. It is essential that you report the harassment to Human Resources.

(Please refer to the detailed The Hackett Group Harassment Policy located on the Human Resources page of Mind~Share).

### **Insider Trading**

Our policy is to fully comply with all securities laws. These laws govern transactions in our securities and the securities of other companies, and they provide substantial civil and criminal penalties for individuals who fail to comply. These penalties apply regardless of whether you derive any personal financial benefit from your actions. Further, if you fail to comply with the securities laws, you could subject our company to substantial civil and criminal penalties, as well as long-term damage to our corporate reputation.

If you possess any material information about our company that we have not yet disseminated to the public, you must not:

- Buy or sell our stock
- Pass such information on to anyone else, even to other associates, unless they have business need to know
- Engage in any other action to take advantage of that non-public material information

Examples of information you might possess that would be considered to be material under the securities laws are contained in the detailed The Hackett Group Insider Trading Policy contained on the Corporate page on Mind~Share. Note that either positive or negative information may be material.

These prohibitions also apply to non-public material information that you may acquire about any other company during the course of your employment with our company. For example, if you become aware that we are going to acquire a public company, and news of the acquisition has not yet been publicly released, you must not buy or

sell the stock of the company to be acquired or pass on to anyone else information regarding the pending acquisition.

The restrictions of this policy also apply to your family members and others living in your household. You are responsible for the compliance of such persons with the securities laws.

Even the appearance of an improper transaction must be avoided. Accordingly, even if you believe that you do not possess non-public material information about our company, you should never make a recommendation to anyone to buy, sell or hold our stock.

Our Leadership Team members are subject to additional trading restrictions contained in The Hackett Group Insider Trading Policy.

(Please refer to the detailed The Hackett Group Insider Trading Policy located on the Corporate page on Mind~Share.)

### **International Business**

Our policy is to fully comply with the specific laws and regulations of all countries where we do business and with all U.S. laws affecting international trade such as antiboycott, trade sanction, export control and foreign corrupt practice laws. Violations of these laws carry stiff civil and criminal penalties for you and our company. If you are involved in our international operations, you should be aware of these laws and always consult with the Legal Department to ensure that we never violate any relevant laws.

### **Political Contributions**

Federal law prohibits companies from making contributions to any political candidate, campaign committee or other organization in connection with any federal election. A political campaign contribution can be in the form of money, i.e., cash or checks or an in-kind contribution of property, goods or services. Certain state laws also prohibit companies from making contributions to any political candidate, campaign committee or other organization in connection with any state election. It is our policy to comply with these and all other laws regarding political contributions. You must never use any company facility or other resource in connection with campaign activity. Further, you must never give, offer, or promise anything of value as a bribe, gratuity, or kickback to any U.S. federal, state, or local public official. You are free, of course, to participate in or contribute to political campaigns as an individual, subject to the individual limitation under applicable law. Finally, if you interact with public officials on behalf of our company, you must always comply with all applicable laws including those regarding lobbying and consult our Legal Department when necessary.

### **Time and Expense Reporting**

You are responsible for accurately preparing and submitting time and expense reports on a weekly basis. The time report should reflect actual hours worked, paid time off, and holidays taken. The expense report should reflect actual expenses incurred in accordance with the Company's travel policy. Actual hours worked and expenses incurred with respect to client projects should be charged to the appropriate client project number in order to properly invoice clients.

(Please refer to the following detailed policies: Travel and Expense Policy located on the Finance page on Mind~Share; Personal Time Policy located on the Human Resources page on Mind~Share).

### **Violence in the Workplace / Possession of Firearms**

Our company has a zero tolerance for violent acts or threats of violence by or against our associates. You must never commit or threaten to commit any violent act against a co-worker, customer, vendor, or other person that

you come into contact with in connection with company business. If you are subjected to or threatened with violence by a co-worker, customer, vendor or other person that you come into contact with in connection with company business or if you become aware of another associate who has been subjected to or threatened with such violence, you should report this information to your supervisor or Human Resources as soon as possible. You should never assume that any threat is not serious. We also prohibit all associates and all other persons other than law enforcement and authorized security personnel from bringing firearms, ammunition, explosives, or other weapons of any kind onto company property at any time. Likewise, no associate should possess any firearm, explosive or any other weapon at any time while driving any company owned or rented vehicle, or performing any other off-premises work for our company.

### **Waivers of the Code of Conduct and Ethics**

Any waiver of any provision this Code of Conduct and Ethics for an executive officer or any member of our Board of Directors or, in the case of a waiver of the Financial Officer Code of Ethics, any waiver of any provision thereof for any person, may be made only by a majority of the independent directors of the Board of Directors or a Board committee comprised solely of independent directors. Any such waivers and all amendments to the Financial Officer Code of Ethics will be promptly disclosed as required by law, regulations or stock exchange rules to which the company is subject.

### **Reporting Violations**

Reporting known or suspected violations of our Code of Conduct and Ethics is a sensitive issue. However, you must recognize that violations could have a profoundly adverse effect on our investors, our customers, our associates, and the company. Therefore, you must promptly report all questionable conduct or violation for suspected violations of this Code of Conduct and Ethics. No disciplinary or other retaliatory action will be taken against any person as a result of reporting any suspected violation.

The first and preferred option for reporting violations of this Code of Conduct and Ethics is for you to talk to your immediate supervisor. If you do not feel comfortable discussing the matter with your immediate supervisor or project manager, you should call Human Resources or the Legal Department. If an associate reports a known or suspected violation of this Code of Conduct and Ethics to you as a supervisor or project manager you must immediately pass that report along to Human Resources, who will investigate the report.

### **Procedures for Reporting Complaints and Concerns Regarding Accounting or Auditing Matters**

The Audit Committee of the Board of Directors has established procedures for (i) receipt, retention and treatment of complaints received by the company regarding accounting controls or auditing matters and (ii) the confidential, anonymous submission by associates of the company of concerns regarding questionable accounting or auditing matters. Messages delivered to the following telephone number, email address, or mailing address seen below are forwarded directly to the General Counsel of the company who will then communicate the messages to the Audit Committee. Company management will not receive the messages.

**1-888-883-1499**

[atreport@telesentry.org](mailto:atreport@telesentry.org)

**The Hackett Group, Inc. Audit Committee**

**C/O General Counsel**

**1001 Brickell Bay Drive, 30<sup>th</sup> Floor**

**Miami, Florida 33131**

Any person who uses this reporting service is guaranteed confidential treatment. All communications made in good faith will be treated promptly and professionally and without risk of retribution whatsoever. Any use of

this reporting procedure in bad faith or in a false or frivolous manner will be considered a violation of this Code of Conduct and Ethics. Further, you should not use the reporting service for personal grievances not involving this Code of Conduct and Ethics.

You may choose to remain anonymous. However, we would prefer you identify yourself to facilitate our investigation of any report. We will use our best efforts to protect the identity of any person who reports potential misconduct in good faith and any retaliation for reports of misconduct by others made in good faith will not be tolerated. Indeed, any associates who engage in retaliation are subject to discipline, up to and including termination, and in appropriate cases, civil and/or criminal liability. We will also use reasonable efforts to protect the identity of the person about or against whom an allegation is brought, unless and until it is determined that a violation has occurred. Any person involved in any investigation, in any capacity, of possible misconduct must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking his or her own legal advice, and is expected to cooperate fully in any investigation.

### **Acknowledgment**

Each associate of our company will be given a copy of this Code of Conduct and Ethics. Anyone hired after the initial distribution of this Code of Conduct and Ethics will receive a copy upon commencing employment. We will circulate an updated version of the Code of Conduct and Ethics on a regular basis to all associates. All associates will be required to re-read this Code of Conduct and Ethics at such time and return another electronic acknowledgment form. Your acknowledgment of, and your continued compliance with, this Code of Conduct and Ethics are conditions of employment, violation of which may result in disciplinary action including termination.

Click [here](#) to access The Hackett Group's Code of Conduct and Ethics Acknowledgment Form. If, when you click on the link above, you get a message that says "A Web browser has not been specified. Do you want to configure the Weblink preferences?" Please do the following:

1. Click "Yes" to configure your Weblink preferences
2. The Weblink Preferences dialog box will appear
3. Click on the down arrow at the "Connection Type" field and select a browser
4. Click "OK"
5. Disregard the next error message and click "OK". You should now be able to access all hyperlinks from within Adobe Acrobat Reader. This set-up process only needs to be completed only once.