

## HUMAN RIGHTS AND MODERN SLAVERY POLICY

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The Hackett Group, Inc. (NASDAQ: HCKT) is an intellectual property-based strategic consultancy and leading enterprise benchmarking and best practices digital transformation firm to global companies. We serve an interconnected global client base and as such strive to do our part as responsible corporate citizens. One such obligation is to ensure that we ethically source our vendors and partners. To this end, we work hard to ensure that we safeguard the human rights of our staff and any other individuals that we interact with, either directly or indirectly, in furtherance of the principles of the UN Global Compact (UNGC), UN Universal Declaration of Human Rights (UNDHR) and the aims of the International Labor Organization (ILO).

### Policy Application

This policy applies to The Hackett Group, Inc. and all of its subsidiaries (collectively “The Hackett Group”), contractors, subcontractors and vendors. We expect our contractors, vendors and sub-contractors to adhere to this policy and encourage them to take steps of their own to make sure these guiding principles are furthered.

### Basic Principles

The Hackett Group seeks to:

- Prevent or mitigate any negative human rights impact that is related to our business (whether by us or through any business relationship);
- Avoid contributing to or in any way causing negative human rights impacts through our activities, and should such impacts occur, remedy the same promptly and appropriately; and
- If we determine that we were in any way involved in an adverse human rights impact, cooperate in the remediation of the same through legitimate and appropriate processes;

### Policy

- **Modern Slavery.** The Hackett Group will not use any forced, bonded or involuntary labor. Workers are not required to lodge deposits or identity papers and may leave in accordance with applicable law by giving reasonable notice and receiving all wages due and owing. The Hackett Group has a zero-tolerance policy for any human trafficking.
- **Child Labor.** The Hackett Group will not utilize any child labor and will comply with all applicable laws relating to the same. We may support internships, apprenticeships and other educational and training experiences that comply with applicable law.
- **Health and Safety.** The Hackett Group will provide work environments that comply with the health and safety requirements prescribed by law, including the US OSHA and appropriate European laws and the laws of other jurisdictions where we conduct business.
- **Discipline.** Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are strictly prohibited. Disciplinary and grievance procedures are clearly documented and communicated to all employees in The Hackett Group’s policies and procedures. All disciplinary measures of a serious nature are recorded and actioned.
- **Working Hours:** The Hackett Group will ensure that working hours are reasonable and comply with the law and industry standards.
- **Freedom of Association:** We recognize that all our employees have the right to form and join organizations of their own choosing as long as it does not contravene with our policies or otherwise interfere with our business relationships.
- **Discrimination:** Discrimination in access to employment, training and working conditions, on grounds of race, color, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin is strictly prohibited. We believe in promoting equality of opportunity and treatment as outlined in our policies and procedures.
- **Employment terms:** Where appropriate, we will provide written and clear contracts which detail the terms and conditions of employment. We will ensure that work performed by employees is on the basis of recognized employment law and practice.

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- **Compensation:** The Hackett Group does not provide wages or benefits below the minimum required by law. We will provide employees with clear written information on their pay and conditions. We do not permit deductions from wages as a disciplinary measure. We are an equal opportunity employer and are committed to equal pay and benefits for men and women for equal work.

### Grievance and remediation

Where a human rights violation is identified, we'll work with all parties involved to ensure victims have access to remedy, compensation and justice. We'll also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring.

If an issue arises that cannot be resolved locally, or for which you believe the normal process is not suitable, please contact our General Counsel Frank Zomerfeld as provided below.

If by mail:  
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c/o General Counsel,  
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