

MODERN SLAVERY ACT STATEMENT - 2019

The Hackett Group, Inc. and its global operating subsidiaries (collectively “Hackett”) is an intellectual property-based strategic consultancy and leading enterprise benchmarking and best practices digital transformation firm to global companies.

Modern Slavery Act 2015

The Modern Slavery Act 2014 (the “Act”) imposes a duty on businesses to play their part in stopping modern slavery in global supply chains. The Hackett Group is committed to being a responsible business and complying with the requirements of the Act.

Section 54 of the Act (transparency in Supply Chains) requires us to publish a statement on our website outlining the steps we have taken during the fiscal year to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business. A “supplier” is a business, that supplies goods and/or services or both to The Hackett Group.

Supply Chain

The Hackett Group’s subsidiaries are part of its global supply chain but are required to adhere to a global set of standards for the organization as a whole and are not considered to be “suppliers” for the purpose of this Modern Slavery Act Statement. The Hackett Group serves an international client base and has entities and/or offices in the United States of America, the United Kingdom, The Netherlands, Spain, Germany, France, Switzerland, Uruguay, India, Canada and Australia.

We operate the following policies and procedures that describe our approach to the identification of modern slavery risks and the steps we have taken to prevent slavery and human trafficking in our operations.

- **Global Partner Code of Conduct.** Our [Global Partner Code of Conduct](#), OEMs, suppliers, agents, entities and/or individuals who do business with or on behalf of The Hackett Group. Key requirements are:
 - All suppliers must have policies, systems and procedures in place to ensure the prevention of unethical business practices, including, but not limited to, human rights abuses, fraud, bribery, corruption, conflicts of interest and fair competition.
 - Suppliers are prohibited from using slave labor, child labor, or forced labor, or engaging in, or supporting, human trafficking.
 - All suppliers must ensure that working hours, wages, overtime pay and working conditions are in compliance with applicable law.
 - All suppliers must ensure that they provide a clean, safe and healthy working environment to ensure the occupational safety of all employees.
- **Culture and Ethics.** We promote an environment where people are inspired, challenged and can work together and be successful regardless of their background. Our values are guided by:
 - Honesty and integrity in our dealings with our clients, partners and ourselves.
 - Maintaining the highest standards in our conduct for our professional relationships
 - Empowerment and personal responsibility and mutual support and respect for each other.
 - We promote qualities of integrity, objectivity, competence, respect for privacy and confidentiality, and professional behavior among our staff.
- **Recruitment.** We utilize respectable and reputable agencies to assist us in sourcing our staff and we always verify the practices of any new suppliers of such services. Our policies include making sure that all candidates produce original documentation indicating that they have the right to work in the jurisdiction where they are being hired prior to the commencement of their employment.
- **Whistleblowing.** The Hackett Group encourages any employee or supplier to report any concerns related to the activities of The Hackett Group or any of its suppliers. Our whistleblowing policy is designed to make it easy for individuals to report concerns without fear of retaliation using our reporting process.

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- **Consistent with the requirements of the Act**
 - We have a public facing Modern Slavery Policy
 - We include in all new contracts with suppliers a reference to our Global Partner Code of Conduct.
 - For suppliers with existing contracts predating the Global Partner Code of Conduct, we send notices to such suppliers referring them to the Global Partner Code of Conduct and requiring their compliance therewith.
 - Where a supplier fails to meet the requirements of the Act, we will work with them to achieve the desired outcome or cease doing business with them.
 - We will provide adequate training to pertinent staff to assist them in identifying risks with new suppliers.

This statement constitutes the Modern Slavery Act Statement of The Hackett Group, Inc. and its subsidiaries, for the fiscal year ending December 31, 2019.

Frank Zomerfeld
General Counsel