



## Policy and Procedure for Reporting Critical Incidents

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Created by:	Compliance
Approved by:	Josh Cash, Chief Compliance Officer
Policy Owner:	Compliance
Confidential level:	Confidential

### Purpose

It is the policy of Huron Consulting Group Inc. (the “Company” of “Huron”) to maintain a safe and professional work environment, that complies with applicable workplace laws and promotes reporting of Critical Incidents that may adversely impact the Company or the welfare of Company employees. All Company employees are responsible for complying with this Policy and all relevant laws.

This Policy further emphasizes the Company’s commitment to employee communication. The Reporting Procedure outlined below establishes the process for employees to report Critical Incidents, identifies available resources for employees, and defines the Company official who is responsible for the prompt management of any subsequent investigations as warranted.

### Critical Incident Definition

A Critical Incident is defined as an event with the potential to adversely impact the Company’s brand, physical or information assets, or the safety and welfare of Company employees.

### Reporting Procedure

Employees are required to immediately report details regarding a Critical Incident to his/her Supervisor, a Managing Director, Human Resources Business Partner or other identified Company resources as described in related policies, which include, but are not limited to, the following:

[All Company Policies](#)

[Code of Business Conduct and Ethics](#)

[Harassment and Discrimination](#)

[Drugs, Narcotics and Alcohol](#)

[Violence-Free Workplace](#)

[Insider Trading](#)

Reports may be made through the mail, the Company’s Huron Help Line, or the Company’s web-based reporting system([www.ethicspoint.com](http://www.ethicspoint.com)), all of which allow personnel to submit reports anonymously.

Failure to report an incident is itself a violation of Company policy, and may subject involved employees to disciplinary action, up to and including termination of employment.

Retaliation against an employee for reporting, in good faith, an actual or suspected Critical Incident will not be tolerated and result in disciplinary action, up to and including termination of employment.

Any supervisor or Managing Director who suspects or has knowledge of a Critical Incident should reference the Critical Incident Reporting Matrix to promptly report and engage the respective organization responsible for the investigation of the incident.

All reported Critical Incidents will be promptly investigated and treated confidentially to the extent possible. It is imperative that reporting persons not conduct their own preliminary investigations. Investigations of Critical Incidents may involve complex legal issues and acting on your own may compromise the integrity of an investigation and adversely affect both you and the Company.

**Critical Incident Reporting Matrix**

This matrix identifies the various types of Critical Incidents, applicable reporting processes, and respective Company organizations responsible for Critical Incident investigations. When submitting a report, Company employees, Supervisors, and Managing Directors should reference this matrix, which provides a non-exhaustive list of the types of Critical Incidents that must be reported and the proper organization that must be immediately engaged upon the reporting of a Critical Incident.

<b>Incident Type</b>	<b>General Definition</b>	<b>Reporting Process</b>
Accounting Practices	Statements or actions that violate or conflict with either internal policies, procedures or government regulations related to the reporting of financial records or transactions, including, but not limited to, the submission of reports or records that overstate or misrepresent business related expenses.	Contact Corporate Controller
Conflict of Interest	Any personal or financial interest, business or professional activity or relationship, prior or current employment, or contractual or legal obligation that may interfere with the ability to objectively perform job duties or otherwise impair objectivity.	Contact Chief Compliance Officer
Disclosure of Confidential Information	The unauthorized or illegal disclosure, copying, duplication or misuse of confidential, proprietary, or personal data, including, but not limited to, information and data concerning Huron’s or Huron’s customer’s employees, finances, medical and health, customer lists,	Contact Chief Compliance Officer

	proposal, contracts, business plans, personnel records or other property regarded as confidential.	
Discrimination	Statements or actions based on age, race, color, national origin, sexual orientation, gender, disability or religion that are the basis for employment, promotion or compensation decisions.	Contact your Human Resources Business Partner
Employee Death in the Workplace	Death of an employee or contractor in the workplace or while conducting business.	Contact your Human Resources Business Partner
Environmental, Health and Safety	Conduct, actions or practices that either violate environmental, health or safety laws or regulations, or may cause or result in potentially hazardous conditions that impact the environment, or the health or safety of employees, clients or others.	Contact Senior Director Global Security
Ethical Violation	Actions that fail to reflect the exercise of personal integrity and are inconsistent with Huron's core values and policies	Contact Chief Compliance Officer
Fraud or Theft	The use of one's occupation for personal enrichment through the deliberate misuse, misapplication or unauthorized removal of Company or Client resources or assets.	Contact Senior Director Global Security
Gifts, Bribes and Kickbacks	Payments, gifts, bribes or benefits extended to or received by clients, employees, suppliers, vendors, competitors, directors, officers or government officials, or other third parties that are unlawful, improper, or designed to influence business decisions, contract awards, or political processes.	Contact Chief Compliance Officer
Harassment - Sexual	Statements or actions expressing unwelcome sexual advances, requests for sexual favors, unsolicited physical contact, offensive verbal or visual expressions of a sexual nature.	Contact your Human Resources Business Partner
Harassment –Workplace	Persistent statements, conduct or actions that are uninvited, degrading, offensive, or intimidating and create an unpleasant or hostile work environment.	Contact your Human Resources Business Partner
Information Technology or Data Security Breaches	The unauthorized access of Huron information technology assets.	Contact Senior Director Information Security
Kidnapping of a Huron employee or extortion against the Company	The act of obtaining, or attempting to obtain either money, property, or services through coercion, to include the kidnapping of an employee.	Contact Senior Director Global Security
Law Enforcement	Any contact with or calls received from any law enforcement agencies regarding Huron or a Huron employee matter.	Contact Senior Director Global Security
Natural Disaster or an Act of Terrorism that Disrupts Operations	A natural occurrence or the use of unlawful violence or threat of unlawful violence to induce fear or intimidate governments or societies in the pursuit of political, religious, or ideological goals which adversely impact business operations.	Contact Senior Director Global Security

Retaliation or Retribution	Statements or actions of discharging, demoting, suspending, threatening, harassing, or discriminating against an employee because of any lawful act taken by such employee in connection with reporting a violation of law or policy, a complaint, or assisting with an investigation or proceeding.	Contact your Human Resources Business Partner
Substance Abuse	The unlawful use, possession, sale, conveyance, distribution, concealment, transportation or manufacture of illegal drugs, intoxicants, controlled substances, or drug paraphernalia in the workplace or while conducting business.	Contact Senior Director Global Security
Threats and Physical Violence	Statements or actions that threaten acts of violence or the presence of weapons, firearms, ammunition, explosives, or incendiary devices in the workplace, on work premises or in work vehicles.	Contact Senior Director Global Security
Trading on Insider Information	The purchase or sale of stock or other securities based on non-public and material information obtained during employment or providing such information to another person who purchases or sells stock or other securities based upon that information.	Contact General Counsel

### Change History

<b>Date:</b>	<b>Version:</b>	<b>Created by:</b>	<b>Description of change:</b>
January 2011	1.0	Compliance	Effective date.
December 2022	2.0	Hilary Weiss	Review and minor updates.
November 2023	3.0	Josh Cash	Annual review and minor updates.